



Huff&Huff,

SITE INVESTIGATION and REMEDIAL ACTION REPORT

STAINED SOIL AND PAD SHEFFIELD STEEL CORP. JOLIET FACILITY USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp. Joliet, Illinois

prepared by:

Huff & Huff, Inc. James E. Huff, P.E. Sarah Monette, P.E.

August 1, 2000

TABLE OF CONTENTS

1.	INTRO	DDUCTION	
	1.1 1.2	Project Overview Project Organization and Key Personnel	. 1
	k . 4	Project Organization and Rey reisonner	٠ ٤
2.	SAMP	LING APPROACH and RATIONALE	.4
	2.1	Overview of Approach and Rationale	.4
	2.2	Contaminants of Potential Interest	.4
3.	INVES	STIGATION FINDINGS and REMEDIAL ACTIONS	.6
-	3.1	Area Descriptions	
		3.1.1 Former Oil Drum Accumulation Area	.6
		3.1.2 Oil Room / Gear Box Area	.6
		3.1.3 Mill Scale Cooling Tank Area	.7
	3.2	Soil Investigation and Remediation Activities	
	3.3	Pad Investigation and Remediation Activities	.8
		LIST OF TABLES	
TABL	Ε		
	2-1	TCLP Parameters	.5
	3-1	Oil Drum Accumulation Area, Soil Sample Results, 04/28/00	.9
	3-2	Oil Room / Gear Box Area, Soil Sample Results, 04/28/00	0
	3-3	Mill Scale Cooling Tank Area, Soil Sample Results, 04/28/00	[1
	3-4	Drum Accumulation Pad, Cleaning Water Sample Results, 04/28/00	2
		LIST OF FIGURES	
FIGUI	RE		
	1-1	Locations of Stained Soils and Pad	.3
		LIST OF APPENDICES	
APPE	NDIX		
	A	Field Work Procedures	
	В	Laboratory Analytical Reports	
	С	Disposal Documentation	

Í

Page

frants INTRODUCTION

Project Overview 1.1

This report addresses the investigation and remediation of three stained soil areas and a stained concrete pad identified at the Sheffield Steel facility located in Joliet, Illinois. The stained soils and pad were identified in August 1999, during a site inspection conducted by the United States Environmental Protection Agency (USEPA). The areas appeared to be stained with petroleum oil.

One stained soil area was located at the facility's former "oil drum accumulation area," a second area was located near the "oil room," and the third area was located near the "mill scale cooling tank." The concrete pad underlies the former "oil drum accumulation area." Figure 1-1 depicts the areas.

In April/May 2000, the stained soils were excavated and the stained pad was cleaned. The soils and cleaning waters were sampled and disposed of off-site. The sampling was performed to determine whether the waste materials should be managed as hazardous wastes, as defined by the Resource Conservation and Recovery Act (RCRA). The waste materials were not hazardous waste and therefore were disposed of as non-hazardous "oil contaminated soils" and "water and oil." All necessary investigation and remediation activities are complete.

1.2 Project Organization and Key Personnel

The USEPA requested Sheffield Steel address the stained soils and pad in correspondence dated December 9, 1999. Sheffield Steel's legal counsel (Collier, Shannon, Rill & Scott) retained Huff & Huff, Inc. (H&H) to perform the investigation.

1

Key project personnel are:

Mr. Patrick Kuefler

USEPA

Project Manager

Ms. Deirdre Flannery-Tanaka USEPA

Legal Office

Mr. Douglas Strickland

Sheffield Steel Corp.

Mgr. Of Env., Health, & Safety

Mr. Frank DiFalco

Sheffield Steel Corp.

Operations Manager

Mr. Joe Zotto

Sheffield Steel Corp.

Gen'l Supervisor of Maintenance

Mr. John L. Wittenborn

Collier, Shannon, Rill & Scott Legal Counsel

Mr. James E. Huff, P.E.

H&H Environmental

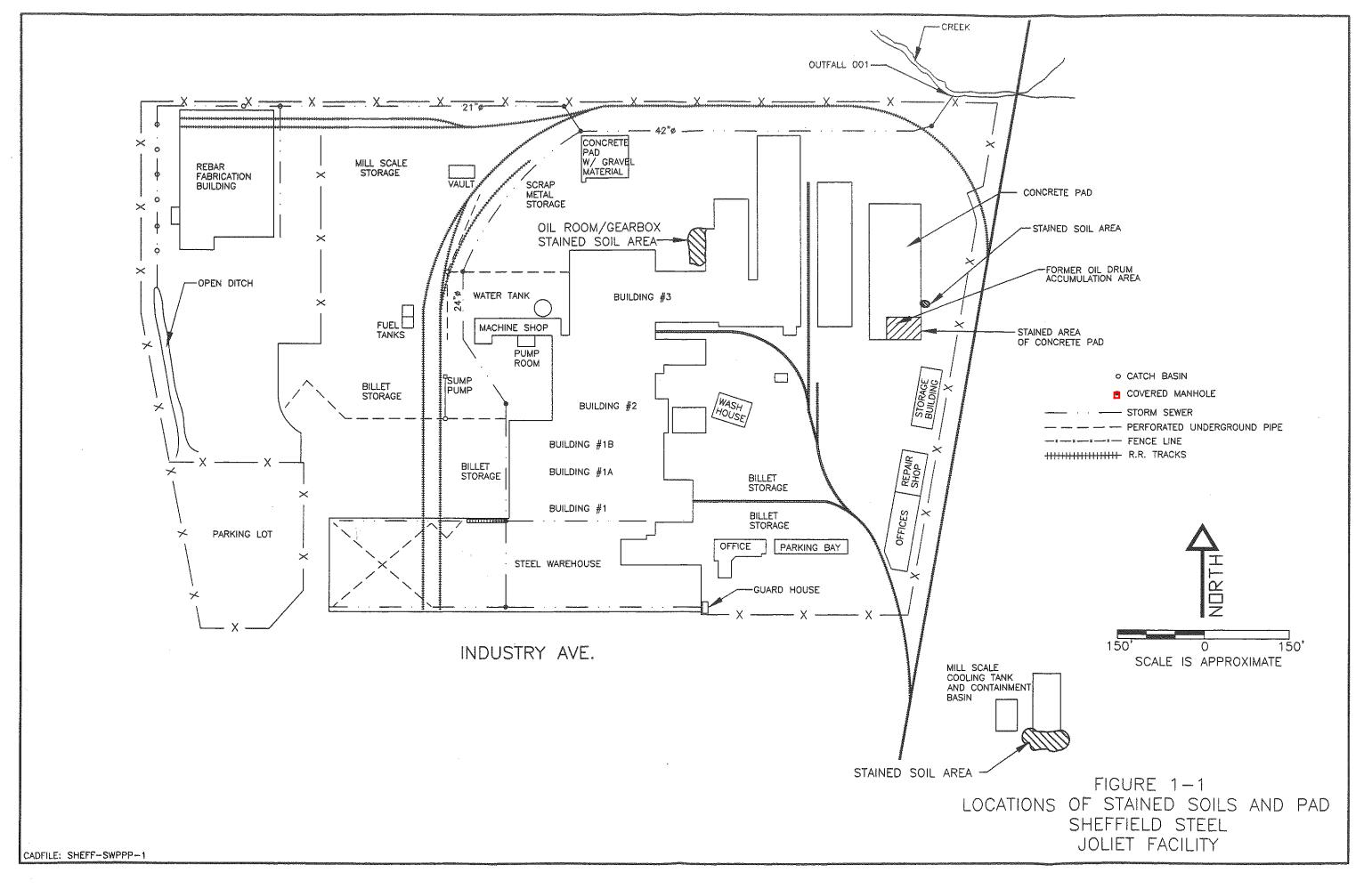
Principal Consultant

Ms. Sarah Monette, P.E.

H&H Environmental

Sr. Project Engineer

Contractors used during the project were Superior Special Services, Waste Management Inc. (Laraway Landfill, Illinois) and Crest Environmental (Crest Hill, Illinois).



2. SAMPLING APPROACH and RATIONALE

2.1 Overview of Approach and Rationale

The objectives of the investigation were to remove the petroleum-stained soils, to clean the petroleum staining from the concrete pad, and to determine whether the waste materials should have been managed as RCRA hazardous wastes.

2.2 Contaminants of Potential Interest

The contaminants of potential interest were limited to those contaminants that would make the waste materials RCRA hazardous wastes. Of the four potential hazardous waste characteristics, the only characteristic of interest was toxicity; the petroleum-impacted materials would not reasonably be expected to have the characteristics of reactivity, ignitibility, or corrosivity. This expectation is consistent with the generator's knowledge and the characteristics of the wastes routinely generated at the facility.

In order to determine whether the soils and cleaning waters exhibited the RCRA toxicity characteristic, a full scan of TCLP organics and TCLP metals was performed on samples. The TCLP parameters are listed in Table 2-1, along with their RCRA regulatory concentrations.

TABLE 2-1
TCLP PARAMETERS

TCLP Organics	RCRA Level, mg/L	TCLP Metals	RCRA Level, mg/L
Benzene	0.5	Arsenic	5.0
Carbon tetrachloride	0.5	Barium	100.0
Chlorobenzene	100.0	Cadmium	1.0
Chloroform	6.0	Chromium	5.0
1,2-Dichloroethane	0.5	Lead	5.0
1,1-Dichloroethylene	0.7	Mercury	0.2
Methyl ethyl ketone	200.0	Selenium	1.0
Tetrachloroethylene	0.7	Silver	5.0
Trichloroethylene	0.5		
Vinyl chloride	0.2		
o-Cresol	200.0 a/		
m-Cresol	200.0 a/		
p-Cresol	$200.0^{\text{ a}/}$		
1,4-Dichlorobenzene	7.5		
2,4-Dinitrotoluene	0.13 ^{b/}		
Hexachlorobenzene	0.13 ^{b/}		
Hexachlorobutadiene	0.5		
Hexachloroethane	3.0		
Nitrobenzene	2.0		
Pentachlorophenol	100.0		
Pyridine	5.0 b/		
2,4,5-Trichlorophenol	400.0		
2,4,6-Trichlorophenol	2.0		

a/ If o-, m-, and p-cresol concentrations cannot be differentiated, then the total cresol concentration is used. The regulatory level for total cresol is 200 mg/L.

b/ The quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.

3. INVESTIGATION FINDINGS and REMEDIAL ACTIONS

[Note: Field work procedures are documented in Appendix A. Analytical result reports are provided in Appendix B. Disposal documentation is provided in Appendix C.]

3.1 Area Descriptions

3.1.1 Former Oil Drum Accumulation Area

The "oil drum accumulation area" was an accumulation area for drums containing non-hazardous waste grease and oil-contaminated absorbent "pigs." The accumulation area was used for staging the drums before off-site disposal at Land and Lakes non-hazardous landfill. (Note: The area has not been used for drum accumulation since April 2000. In the future, oil drums will be accumulated within a containment area.)

The entire accumulation area was underlain with a concrete pad to avoid direct exposure of the drums to the ground. Some grease and oil stained the concrete pad and the adjacent ground surface to the east, as observed during USEPA's August 1999 inspection. The staining was the result of minor leaks and spills during routine drum transfer operations. The stained area of the pad measured approximately 45 feet by 20 feet. The stained area of soil measured approximately 18 square feet. Some of the stained-looking materials actually might have been mill scale.

3.1.2 Oil Room / Gear Box Area

An out-of-use gear box was located outside of the "oil room." The gear box was set directly on the ground surface. (The gear box was removed April 2000 and was sold as scrap steel.)

Oils remaining in the gear box overflowed during storm events in 1999. The overflows stained the ground surface, as observed during USEPA's August 1999 inspection. The stained area of soil measured approximately 225 square feet. Some of the stained-looking materials actually might have been mill scale.

3.1.3 Mill Scale Cooling Tank Area

The "mill scale cooling tank" is used as a settling tank to remove mill scale and oil from waters used at the facility. The mill scale settles to the bottom the tank, then is scooped out, dried, and sold to a reclaim company. The oils are skimmed from the top of the tank, collected into drums, and disposed of off-site.

The adjacent ground surface directly to the south of the tank was stained with a material that appeared to be oil, as observed during USEPA's August 1999 inspection. The stained aea of soil measured approximately 675 square feet. Some of the stained-looking materials actually might have been mill scale.

3.2 <u>Soil Investigation and Remediation Activities</u>

During April/May 2000, the stained soils in each of the three areas were excavated, placed into a roll-off box, and disposed of off-site as non-hazardous waste.

<u>Investigation Findings</u>. Before excavation, the stained soils were sampled to determine whether they were RCRA hazardous wastes. The sample results confirmed that the soils were <u>not</u> hazardous wastes. Tables 3-1 through 3-3 present the results.

<u>Remedial Actions</u>. Complete removal of petroleum-stained soils was confirmed by screening the underlying soils for the presence of petroleum residuals. The screening included visual assessment, olfactory assessment, and use of a photoionization detector (PID); the PID readings are included on Tables 3-1 through 3-3.

Excavation of the soils continued until field screening confirmed that all petroleum-impacted soils were removed. In total, approximately 20 cubic yards (23.2 tons) of soil were removed and disposed of at Laraway Landfill. Upon completion, the excavations were backfilled with clean gravel.

3.3 Pad Investigation and Remediation Activities

During April/May 2000, the concrete pad was cleaned and the cleaning water/residue was disposed of off-site as non-hazardous waste.

<u>Investigation Findings</u>. Before disposal, the cleaning water was sampled to determine whether it was RCRA hazardous waste. The sample results confirmed that the cleaning water was <u>not</u> hazardous waste. Table 3-4 presents the results.

<u>Remedial Actions</u>. The concrete pad was scraped clean of residues, spray-washed with water at high-pressure, scrubbed with Alconox soap and brooms, then spray-rinsed with water at high pressure. A wet-vacuum was used to capture water during washing and rinsing.

The scraped residues were placed into a roll-off box and disposed of off-site (Laraway Landfill) as non-hazardous waste, along with stained soils excavated from the site. The cleaning water captured by the vacuum was drummed and disposed of off-site (Crest Environmental) as non-hazardous wastewater. Four drums (220 gallons of water) were disposed of at Crest Environmental.

TABLE 3-1 OIL DRUM ACCUMULATION AREA Soil Sample Results, 04/28/00

TCLP Organics	RCRA Level,	Result,	TCLP Metals	RCRA Level,	Result,
	mg/L	mg/L		mg/L	mg/L
Benzene	0.5	< 0.10	Arsenic	5.0	< 0.20
Carbon tetrachloride	0.5	< 0.10	Barium	100.0	0.445
Chlorobenzene	100.0	< 0.10	Cadmium	1.0	0.011
Chloroform	6.0	< 0.10	Chromium	5.0	< 0.040
1,2-Dichloroethane	0.5	< 0.10	Lead	5.0	0.388
1,1-Dichloroethylene	0.7	< 0.10	Mercury	0.2	< 0.0002
Methyl ethyl ketone	200.0	< 2.00	Selenium	1.0	< 0.20
Tetrachloroethylene	0.7	< 0.10	Silver	5.0	< 0.050
Trichloroethylene	0.5	< 0.10			
Vinyl chloride	0.2	< 0.10	:		
Total Cresol	200.0	< 0.10			
1,4-Dichlorobenzene	7.5	< 0.10			
2,4-Dinitrotoluene	0.13	< 0.10			
Hexachlorobenzene	0.13	< 0.10			
Hexachlorobutadiene	0.5	< 0.10			
Hexachloroethane	3.0	< 0.10			
Nitrobenzene	2.0	< 0.10			
Pentachlorophenol	100.0	< 0.50			
Pyridine	5.0	< 0.10			
2,4,5-Trichlorophenol	400.0	< 0.50			
2,4,6-Trichlorophenol	2.0	< 0.10			

PID Readings, ppm (10.2 eV PID) Quadrant A: 0 Quadrant B: 0

Quadrant C: 0

Quadrant D: 0

TABLE 3-2 OIL ROOM / GEAR BOX AREA Soil Sample Results, 04/28/00

TCLP Organies	RCRA Level,	Result,	TCLP Metals	RCRA Level,	Result,
	mg/L	mg/L		mg/L	mg/L
Benzene	0.5	< 0.10	Arsenic	5.0	< 0.20
Carbon tetrachloride	0.5	< 0.10	Barium	100.0	0.641
Chlorobenzene	100.0	< 0.10	Cadmium	1.0	0.026
Chloroform	6.0	< 0.10	Chromium	5.0	< 0.040
1,2-Dichloroethane	0.5	< 0.10	Lead	5.0	< 0.200
1,1-Dichloroethylene	0.7	< 0.10	Mercury	0.2	< 0.0002
Methyl ethyl ketone	200.0	< 2.00	Selenium	1.0	< 0.20
Tetrachloroethylene	0.7	< 0.10	Silver	5.0	< 0.050
Trichloroethylene	0.5	< 0.10			
Vinyl chloride	0.2	< 0.10			
Total Cresol	200.0	< 0.10			
1,4-Dichlorobenzene	7.5	< 0.10			
2,4-Dinitrotoluene	0.13	< 0.10			
Hexachlorobenzene	0.13	< 0.10			
Hexachlorobutadiene	0.5	< 0.10			
Hexachloroethane	3.0	< 0.10			
Nitrobenzene	2.0	< 0.10			
Pentachlorophenol	100.0	< 0.50			
Pyridine	5.0	< 0.10			
2,4,5-Trichlorophenol	400.0	< 0.50			
2,4,6-Trichlorophenol	2.0	< 0.10		4.3000A00450m	- MADE DAY .

PID Readings, ppm (10.2 eV PID) Quadrant A: 0 Quadrant B: Quadrant B: 0

Quadrant C: 0

Quadrant D: 0

TABLE 3-3 MILL SCALE COOLING TANK AREA Soil Sample Results, 04/28/00

TCLP Organics	RCRA Level,	Result,	TCLP Metals	RCRA Level,	Result,
	mg/L	mg/L		mg/L	mg/L
Benzene	0.5	<0.10	Arsenic	5.0	< 0.20
Carbon tetrachloride	0.5	< 0.10	Barium	0.001	0.356
Chlorobenzene	100.0	<0.10	Cadmium	1.0	<0.010
Chloroform	6.0	< 0.10	Chromium	5.0	< 0.040
1,2-Dichloroethane	0.5	< 0.10	Lead	5.0	< 0.200
1,1-Dichloroethylene	0.7	< 0.10	Mercury	0.2	< 0.0002
Methyl ethyl ketone	200.0	< 2.00	Selenium	1.0	< 0.20
Tetrachloroethylene	0.7	< 0.10	Silver	5.0	< 0.050
Trichloroethylene	0.5	< 0.10			
Vinyl chloride	0.2	< 0.10			
Total Cresol	200.0	< 0.10			
1,4-Dichlorobenzene	7.5	< 0.10			
2,4-Dinitrotoluene	0.13	< 0.10			
Hexachlorobenzene	0.13	< 0.10			
Hexachlorobutadiene	0.5	< 0.10			
Hexachloroethane	3.0	< 0.10			
Nitrobenzene	2.0	< 0.10			
Pentachlorophenol	100.0	< 0.50			
Pyridine	5.0	< 0.10			
2,4,5-Trichlorophenol	400.0	< 0.50			
2,4,6-Trichlorophenol	2.0	< 0.10			

PID Readings, ppm (10.2 eV PID) Quadrant A: 0 Quadrant B: 0

Quadrant C: 0

Quadrant D: 0

TABLE 3-4
DRUM ACCUMULATION PAD
Cleaning Water Sample Results, 04/28/00

TCLP Organics	RCRA Level,	Result,	TCLP Metals	RCRA Level,	Result,
	mg/L	mg/L		mg/L	mg/L
Benzene	0.5	< 0.10	Arsenic	5.0	< 0.20
Carbon tetrachloride	0.5	< 0.10	Barium	100.0	0.618
Chlorobenzene	100.0	< 0.10	Cadmium	1.0	0.013
Chloroform	6.0	< 0.10	Chromium	5.0	< 0.040
1,2-Dichloroethane	0.5	< 0.10	Lead	5.0	0.654
1,1-Dichloroethylene	0.7	< 0.10	Mercury	0.2	0.0008
Methyl ethyl ketone	200.0	<2.00	Selenium	1.0	< 0.20
Tetrachloroethylene	0.7	< 0.10	Silver	5.0	< 0.050
Trichloroethylene	0.5	< 0.10			
Vinyl chloride	0.2	< 0.10			
Total Cresol	200.0	< 0.10			,
1,4-Dichlorobenzene	7.5	< 0.10			
2,4-Dinitrotoluene	0.13	< 0.10			
Hexachlorobenzene	0.13	< 0.10			
Hexachlorobutadiene	0.5	< 0.10			
Hexachloroethane	3.0	< 0.10			
Nitrobenzene	2.0	< 0.10			
Pentachlorophenol	100.0	< 0.50			
Pyridine	5.0	< 0.10			
2,4,5-Trichlorophenol	400.0	< 0.50			
2,4,6-Trichlorophenol	2.0	< 0.10		002-	± 600 = 17

Sheffield Steel Joliet Facility Joliet, Illinois

SAMPLING and QA/QC PROTOCOL April 28, 2000

1. SOIL SAMPLE COLLECTION

<u>Sampling Method</u>. Soil samples were collected using a stainless steel trowel. The samples were collected from within one foot of the ground surface, which was within the depth of petroleum staining.

Composite samples and grab samples were collected. Composite samples were collected for analysis of metals. The use of composite samples helped to assure representative sampling of the stained areas. Grab samples were collected for analysis of organics. Composite samples could not be collected for organics because the handling could release the volatile organic constituents.

For composite samples, each stained area was divided into four quadrants. A sample of the stained soil was collected from the center of each quadrant. The four quadrant samples were placed in a stainless steel bowl and mixed with the trowel, then the mixed sample was placed in the sample container. For grab samples, a sample of the stained soil was collected from the center of each quadrant and field-screened with a PID (as described below). A grab sample then was collected from the quadrant with the highest PID reading and placed in the sample container.

<u>Field Screening</u>. Samples were visually characterized at the time of collection. The characterization included visual inspection for soil type and color, water content, and petroleum contaminant-related materials.

Grab samples collected for volatile organic analysis also were field screened with a PID. The PID was used to screen the samples for the presence of VOCs using a closed-cup protocol. A sample of the soil was placed in a one-pint plastic cup, approximately half-full. A lid was placed on the cup and the cup was set aside for approximately 15 minutes in a warmed area to allow the

concentration of volatiles in the headspace to come into equilibrium with the concentration of volatiles in the soil. The lid was slit with a razor knife and the PID probe was inserted into the headspace.

The PID responses were provided in parts per million (ppm) readings. The PID meter has a detection range of 1 ppm to 2,000 ppm, and is calibrated to read in equivalent ppm of benzene. This headspace method allows detection of volatiles at relatively low detection levels, and the method is reproducible.

2. CLEANING WATER SAMPLE COLLECTION

<u>Sampling Method</u>. Cleaning water samples were collected using disposable bailers. The samples were collected as grab samples from the drums of water captured by the wet-vacuum.

<u>Field Screening</u>. Samples were visually characterized at the time of collection. The characterization included visual inspection for water color, residue content, and petroleum contaminant-related materials.

3. SAMPLING HANDLING AND IDENTIFICATION

3.1 Sample Preservation

<u>Containers</u>. Samples were placed in containers provided by the laboratory (clear glass quart jars for soil; amber glass quart jars for cleaning water). The containers met the minimum quality requirements set forth in USEPA "OSWER Directive No. 9240.0-05A, Specifications and Guidance for Contaminant-Free Sample Containers."

Additives. Samples did not require field preservation with chemical additives.

<u>Temperature Control</u>. All samples were maintained in coolers with ice. Samples were placed in the coolers as soon as possible after sample collection.

3.2 Sample Labels

Samples were identified by a sticker-label affixed to the container. The information was recorded in waterproof ink. The information recorded on the label included:

Project name (Sheffield Steel)
Sample location (e.g., Drum Acc Soil)
Sample type (composite or grab)

Date (04/28/00)

• Initials of sampler (STM)

3.3 Sample Packing and Shipping

The following procedures were used to assure the integrity of sample containers during shipping:

- Careful packing of sample containers in coolers (e.g., use of packing materials).
- Placement of each sample container in an individual plastic baggie to help assure containment, prevention of cross-contamination, and protection of labels.
- Double-bagging of ice to minimize potential for water damage to labels and/or seepage into containers.

3.4 <u>Sample Custody</u>

Chain-of-custody began as soon as a sample was collected. Once sample labels were placed on sample containers, the containers were documented on a chain-of-custody form. The laboratory provided the forms.

4. <u>EQUIPMENT DECONTAMINATION</u>

Decontamination of soil sampling equipment was performed in the following steps:

- 1. Tap water and Alconox wash and scrub.
- 2. Tap water rinse.
- 3. Distilled water rinse.
- 4. Methanol rinse.
- 5. Distilled water rinse.
- 6. Thorough air drying.

Decontamination was performed on site, in an area located away from the sampling activities. (Note: Decontamination of water sampling equipment was not necessary. The only sampling equipment used was disposable bailers.)

5. <u>INVESTIGATION-DERIVED WASTE MANAGEMENT</u>

The investigation-derived wastes generated were excavated soils, cleaning waters and residues, and decontamination water.

The excavated soils and scraped residues were placed into a 20 cubic yard roll-off box. The box was lined with plastic and covered with a plastic/canvas tarp. The soils were disposed of off-site (Laraway Landfill) as non-hazardous waste. (May 24, 2000; Ticket No. 846819; 23.2 tons.)

The water cleaning captured by the wet-vacuum was drummed and disposed of off-site (Crest Environmental) as non-hazardous wastewater. (May 17, 2000; 220 gallons.)

A small volume of decontamination water was generated: approximately 0.5 gallon per soil sample. The decontamination water was discarded into the soil roll-off box upon completion of sampling activities.

6. **DOCUMENTATION**

Field documentation included entries in a field log book and site photographs.

7. LABORATORY ANALYSIS

7.1 Illinois Data Quality Goals

The analytical data quality goals were as set forth in the Illinois Environmental Protection Agency (IEPA) "Analytical Quality Assurance Plan" (AQAP) for the Bureau of Land Site Remediation Program.

7.2 Analytical Methods and Detection Limits

Parameters analyzed were TCLP organics and TCLP metals, per USEPA SW-846 guidance. The detection limits were less than or equal to the RCRA regulatory levels.

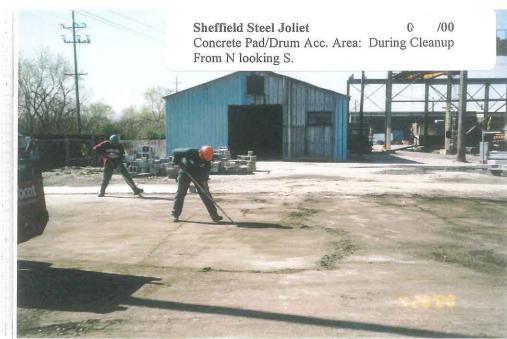
8. **QUALITY ASSURANCE**

Laboratory quality assurance / quality control (QA/QC) was managed by the laboratory. The selected laboratory was Test America in Bartlett, Illinois.

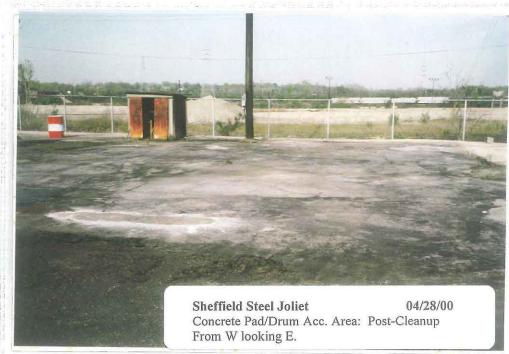
The QA/QC procedures were as set forth in the IEPA AQAP. QA/QC included continuing calibration verification, blank-analysis, laboratory control standard analysis, and matrix spike/matrix spike duplicate (MS/MSD) samples, which the laboratory selected.

\\Darlene\C\1DOC\SHEFFIEL\USEPA9900\SIReportSoilAppA.doc





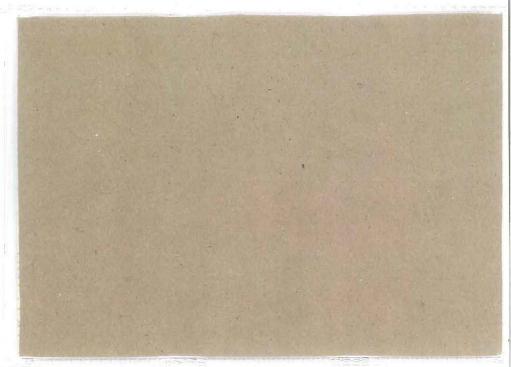


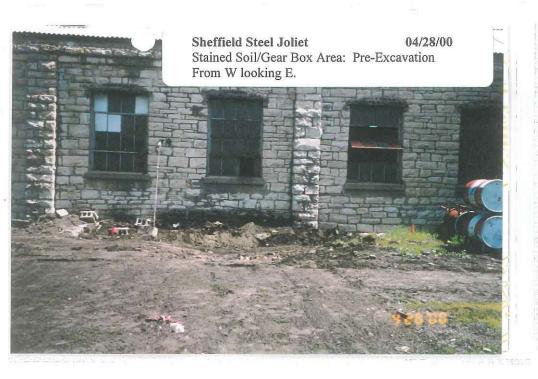


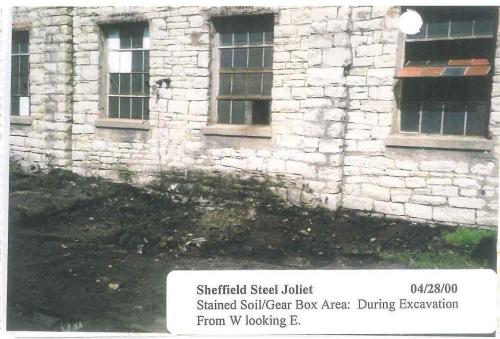




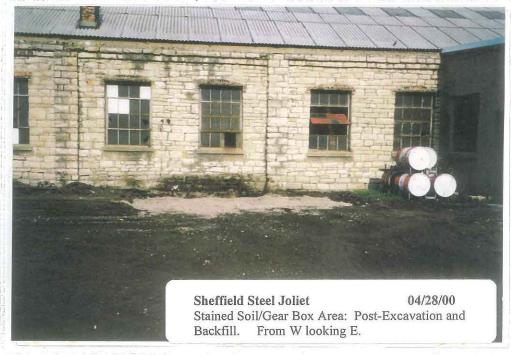






















Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 05/15/2000

Job Number: 00.04376

IEPA Cert. No.: 100221 WDNR Cert. No.: 999447130

Enclosed is the Analytical and Quality Control reports for the following samples submitted to Bartlett Division of TestAmerica for analysis.

Project Description: Sheffield STL

Sample	Sample Description	Date	Date
Number		Taken	Received
	Pad Water Drum Acc Soil (Comp) Gear Box Soil (Comp) Cool Tank Soil (Comp) Drum Acc Soil (Grab) Gear Box Soil (Grab) Cool Tank Soil (Grab)	04/28/2000 04/28/2000 04/28/2000 04/28/2000 04/28/2000 04/28/2000	05/01/2000 05/01/2000 05/01/2000 05/01/2000 05/01/2000 05/01/2000

Sample analysis in support of the project referenced above has been completed and results are presented on the following pages. These results apply only to the samples analyzed. Reproduction of this report only in whole is permitted. Please refer to the enclosed "Key to Abbreviations" for definition of terms. Procedures used follow TestAmerica Standard Operating Procedures which reference the methods listed on your report. Should you have questions regarding procedures or results, please do not hesitate to call. TestAmerica has been pleased to provide these analytical services for you.

This Quality Control report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Approved by:

Mary Mearson Project Manager

Page 1 of 22



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525

05/15/2000

Sample No. : 577720

Job No.: 00.04376

Sample Description:

Pad Water

Sheffield STL

Date Taken: 04/28/2000

Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000 Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No Prep/Run	. Analytical Method
TCLP, ZHE Volatiles Prep	Leached	•		05/02/2000		kmb	728	SW 1311
TCLP Organic Prep	Leached			05/02/2000		kmb	617	SW 1311
TCLP Metals Extraction	Leached			05/02/2000		kmb	118	9 SW 1311
TCLP-Arsenic, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 492	3 SW 6010B
TCLP-Barium, ICP	0.618		mg/L	05/09/2000	0.020	kdw	3097 492	SW 6010B
TCLP-Cadmium, ICP	0.013		mg/L	05/09/2000	0.010	kdw	3097 580	SW 6010B
TCLP-Chromium, ICP	<0.040		mg/L	05/09/2000	0.040	kdw	3097 491	3 SW 6010B
TCLP-Lead, ICP	0.654		mg/L	05/09/2000	0.200	kdw	3097 511	3 SW 6010B
TCLP-Mercury, CVAA	0.0008		mg/L	05/04/2000	0.0002	vgm	1517 137	SW 7470A
TCLP-Selenium, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 472	SW 6010B
TCLP-Silver, ICP	<0.050		mg/L	05/09/2000	0.050	kdw	3097 512	8 SW 6010B
Prep, BNA Extract (TCLP)	Extracted	Į.		05/04/2000		jjh	771	SW 3510C
TCLP-ACID COMPOUNDS 8270								
TCLP-Cresols, Total	<0.10		mg/L	05/12/2000	0.10	keh	771 175	3 SW 8270C
TCLP-o-Cresol	<0.10		mg/L	05/12/2000	0.10	keh	771 175	3 SW 8270C
TCLP-m&p Cresol	<0.10		mg/L	05/12/2000	0.10	keh	771 175	8 SW 8270C
TCLP-Pentachlorophenol	<0.50		mg/L	05/12/2000	0.50	keh	771 175	8 SW 8270C
TCLP-2,4,5-Trichlorophenol	<0.50		mg/L	05/12/2000	0.50	keh	771 175	3 SW 8270C
TCLP-2,4,6-Trichlorophenol	<0.10		mg/L	05/12/2000	0.10	keh	771 175	SW 8270C
Surr: Phenol-d6	32.5		*	05/12/2000	6-59	keh	771 175	3 SW 8270C
Surr: 2-Fluorophenol	43.0		8	05/12/2000	12-81	keh	771 175	SW 8270C
Surr: 2,4,6-Tribromophenol	80.0		*	05/12/2000	27-137	keh	771 175	8 SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525

05/15/2000

Sample No. : 577720

Job No.: 00.04376

Sample Description:

Pad Water

Sheffield STL

Date Taken: 04/28/2000 Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000

Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batc Prep	h No. /Run	Analytical Method
TCLP-VOLATILES 8260									
TCLP-Benzene	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-Carbon Tetrachloride	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-Chlorobenzene	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-Chloroform	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-1,2-Dichloroethane	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-1,1-Dichloroethene	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-Methyl Ethyl Ketone	<2.0		mg/L	05/03/2000	2.0	dap	728	3598	SW 8260B
TCLP-Tetrachloroethene	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-Trichloroethene	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
TCLP-Vinyl Chloride	<0.10		mg/L	05/03/2000	0.10	dap	728	3598	SW 8260B
Surr: Dibromofluoromethane	102.0		¥	05/03/2000	77-121	dap	728	3598	SW 8260B
Surr: Toluene-d8	102.0		*	05/03/2000	85-115	đap	728	3598	SW 8260B
Surr: Bromofluorobenzene	100.0		8	05/03/2000	76-120	dap	728	3598	SW 8260B
TCLP BASE NEUTRAL COMPOUNDS									
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
TCLP-Hexachloroethane	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
TCLP-Nitrobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
TCLP-Hexachlorobutadiene	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
TCLP-2,4-Dinitrotoluene	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
TCLP-Hexachlorobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
TCLP-Pyridine	<0.10		mg/L	05/12/2000	0.10	keh	771	1753	SW 8270C
Surr: Nitrobenzene-d5	81.0		*	05/12/2000	27-118	keh	771	1753	SW 8270C
Surr: 2-Fluorobiphenyl	70.0		*	05/12/2000	29-109	keh	771	1753	SW 8270C
Surr: Terphenyl-d14	26.0		F	05/12/2000	31-123	keh	771	1753	SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

Sample No. : 577721

05/15/2000

LaGrange, IL 60525

Job No.: 00.04376

Sample Description:

Drum Acc Soil (Comp)

Sheffield STL

Date Taken: 04/28/2000 Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000 Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP Metals Extraction	Leached	•		05/02/2000		kmb	1189	SW 1311
TCLP-Arsenic, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 4923	SW 6010B
TCLP-Barium, ICP	0.445		mg/L	05/09/2000	0.020	kdw	3097 4924	SW 6010B
TCLP-Cadmium, ICP	0.011		mg/L	05/09/2000	0.010	kdw	3097 5809	SW 6010B
TCLP-Chromium, ICP	<0.040		mg/L	05/09/2000	0.040	kdw	3097 4913	SW 6010B
TCLP-Lead, ICP	0.388		mg/L	05/09/2000	0.200	kdw	3097 5118	SW 6010B
TCLP-Mercury, CVAA	<0.0002		mg/L	05/04/2000	0.0002	vgm	1517 1372	SW 7470A
TCLP-Selenium, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 4729	SW 6010B
TCLP-Silver, ICP	<0.050		mg/L	05/09/2000	0.050	kdw	3097 5128	SW 6010B



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

05/15/2000

Sample No. : 577722

LaGrange, IL 60525

Job No.: 00.04376

Sample Description:

Gear Box Soil (Comp) Sheffield STL

Date Taken: 04/28/2000

Date Received: 05/01/2000 Time Received: 16:00

Time Taken:

IEPA Cert. No. 100221

WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP Metals Extraction	Leached	e .		05/02/2000		kmb	1189	SW 1311
TCLP-Arsenic, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 4923	SW 6010B
TCLP-Barium, ICP	0.641		mg/L	05/09/2000	0.020	kdw	3097 4924	SW 6010B
TCLP-Cadmium, ICP	0.026		mg/L	05/09/2000	0.010	kdw	3097 5809	SW 6010B
TCLP-Chromium, ICP	<0.040		mg/L	05/09/2000	0.040	kdw	3097 4913	SW 6010B
TCLP-Lead, ICP	<0.200		mg/L	05/09/2000	0.200	kdw	3097 5118	SW 6010B
TCLP-Mercury, CVAA	<0.0002		mg/L	05/04/2000	0.0002	vgm ·	1517 1372	SW 7470A
TCLP-Selenium, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 4729	SW 6010B
TCLP-Silver, ICP	<0.050		mg/L	05/09/2000	0.050	kdw	3097 5128	SW 6010B



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

LaGrange, IL 60525

05/15/2000

Sample No. : 577723

Job No.: 00.04376

Sample Description: Cool Tank Soil (Comp)

Sheffield STL

Date Taken: 04/28/2000

Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000 Time Received: 16:00

WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP Metals Extraction	Leached	•		05/02/2000		kmb	1189	SW 1311
TCLP-Arsenic, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 4923	SW 6010B
TCLP-Barium, ICP	0.356		mg/L	05/09/2000	0.020	kdw	3097 4924	SW 6010B
TCLP-Cadmium, ICP	<0.010		mg/L	05/09/2000	0.010	kdw	3097 5809	SW 6010B
TCLP-Chromium, ICP	<0.040		mg/L	05/09/2000	0.040	kdw	3097 4913	SW 6010B
TCLP-Lead, ICP	<0.200		mg/L	05/09/2000	0.200	kdw	3097 5118	SW 6010B
TCLP-Mercury, CVAA	<0.0002		mg/L	05/04/2000	0.0002	vgm	1517 1372	SW 7470A
TCLP-Selenium, ICP	<0.20		mg/L	05/09/2000	0.20	kdw	3097 4729	SW 6010B
TCLP-Silver, ICP	<0.050		mg/L	05/09/2000	0.050	kdw	3097 5128	SW 6010B



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

05/15/2000 Sample No. : 577724

LaGrange, IL 60525

Job No.: 00.04376

Sample Description:

Drum Acc Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000

Date Received: 05/01/2000

Time Taken:

IEPA Cert. No. 100221

Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No Prep/Run	Analytical Method
TCLP, ZHE Volatiles Prep	Leached			05/02/2000		kmb	728	SW 1311
TCLP Organic Prep	Leached			05/02/2000		kmb	617	SW 1311
Prep, BNA Extract (TCLP)	Extracted	i		05/04/2000		jjh	771	SW 3510C
TCLP-ACID COMPOUNDS 8270								
TCLP-Cresols, Total	<0.10		mg/L	05/12/2000	0.10	keh	771 175	3 SW 8270C
TCLP-o-Cresol	<0.10		mg/L	05/12/2000	0.10	keh	771 175	8 SW 8270C
TCLP-m&p Cresol	<0.10		mg/L	05/12/2000	0.10	keh	771 175	8 SW 8270C
TCLP-Pentachlorophenol	<0.50		mg/L	05/12/2000	0.50	keh	771 1753	SW 8270C
TCLP-2,4,5-Trichlorophenol	<0.50		mg/L	05/12/2000	0.50	keh	771 1753	SW 8270C
TCLP-2,4,6-Trichlorophenol	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
Surr: Phenol-d6	32.5		ક	05/12/2000	6-59	keh	771 1753	SW 8270C
Surr: 2-Fluorophenol	47.5		ક	05/12/2000	12-81	keh	771 175	SW 8270C
Surr: 2,4,6-Tribromophenol	87.5		%	05/12/2000	27-137	keh	771 1753	SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington

Suite 100

LaGrange, IL 60525

05/15/2000

Sample No. : 577724

Job No.: 00.04376

Sample Description:

Drum Acc Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000 Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000

Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst		h No. /Run	Analytical Method
TCLP-VOLATILES 8260		•							
TCLP-Benzene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Carbon Tetrachloride	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Chlorobenzene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Chloroform	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-1,2-Dichloroethane	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-1,1-Dichloroethene	<0.10		mg/L	05/05/2000	0.10	mjo '	728	3599	SW 8260B
TCLP-Methyl Ethyl Ketone	<2.0		mg/L	05/05/2000	2.0	mjo	728	3599	SW 8260B
TCLP-Tetrachloroethene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Trichloroethene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Vinyl Chloride	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
Surr: Dibromofluoromethane	108.0		*	05/05/2000	77-121	mjo	728	3599	SW 8260B
Surr: Toluene-d8	100.0		%	05/05/2000	85-115	mjo	728	3599	SW 8260B
Surr: Bromofluorobenzene	102.0		용	05/05/2000	76-120	mjo	728	3599	SW 8260B



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington

Suite 100 LaGrange, IL 60525 05/15/2000

Sample No. : 577724

Job No.: 00.04376

Sample Description: Drum Acc Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000 Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000 Time Received: 16:00

WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP BASE NEUTRAL COMPOUNDS								
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Hexachloroethane	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Nitrobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Hexachlorobutadiene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-2,4-Dinitrotoluene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Hexachlorobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Pyridine	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
Surr: Nitrobenzene-d5	75.0		%	05/12/2000	27-118	keh	771 1753	SW 8270C
Surr: 2-Fluorobiphenyl	77.0		*	05/12/2000	29-109	keh	771 1753	SW 8270C
Surr: Terphenyl-d14	83.0		ક	05/12/2000	31-123	keh	771 1753	SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

LaGrange, IL 60525

05/15/2000

Sample No. : 577725

Job No.: 00.04376

Sample Description: Gear Box Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000

Time Taken: IEPA Cert. No. 100221 Date Received: 05/01/2000

Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP, ZHE Volatiles Prep	Leached	•		05/02/2000		kmb	728	SW 1311
TCLP Organic Prep	Leached			05/02/2000		kmb	617	SW 1311
Prep, BNA Extract (TCLP)	Extracted	d		05/04/2000		jjh	771	SW 3510C
TCLP-ACID COMPOUNDS 8270								
TCLP-Cresols, Total	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-o-Cresol	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-m&p Cresol	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Pentachlorophenol	<0.50		mg/L	05/12/2000	0.50	keh	771 1753	SW 8270C
TCLP-2,4,5-Trichlorophenol	<0.50		mg/L	05/12/2000	0.50	keh	771 1753	SW 8270C
TCLP-2,4,6-Trichlorophenol	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
Surr: Phenol-d6	38.0		ક	05/12/2000	6-59	keh	771 1753	SW 8270C
Surr: 2-Fluorophenol	52.5		ક	05/12/2000	12-81	keh	771 1753	SW 8270C
Surr: 2,4,6-Tribromophenol	74.5		ક	05/12/2000	27-137	keh	771 1753	SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

LaGrange, IL 60525

05/15/2000

Sample No. : 577725

Job No.: 00.04376

Sample Description:

Gear Box Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000 Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000 Time Received: 16:00

WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst		h No. /Run	Analytical Method
TCLP-VOLATILES 8260		•							
TCLP-Benzene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Carbon Tetrachloride	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Chlorobenzene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Chloroform	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-1,2-Dichloroethane	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-1,1-Dichloroethene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Methyl Ethyl Ketone	<2.0		mg/L	05/05/2000	2.0	mjo	728	3599	SW 8260B
TCLP-Tetrachloroethene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Trichloroethene	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
TCLP-Vinyl Chloride	<0.10		mg/L	05/05/2000	0.10	mjo	728	3599	SW 8260B
Surr: Dibromofluoromethane	108.0		*	05/05/2000	77-121	mjo	728	3599	SW 8260B
Surr: Toluene-d8	104.0		*	05/05/2000	85-115	mjo	728	3599	SW 8260B
Surr: Bromofluorobenzene	106.0		ક	05/05/2000	76-120	mjo	728	3599	SW 8260B



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

05/15/2000

Sample No. : 577725

Job No.: 00.04376

LaGrange, IL 60525

Sample Description: Gear Box Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000

Time Taken:

IEPA Cert. No. 100221

Date Received: 05/01/2000

Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP BASE NEUTRAL COMPOUNDS		•						
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Hexachloroethane	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Nitrobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Hexachlorobutadiene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-2,4-Dinitrotoluene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Hexachlorobenzene	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
TCLP-Pyridine	<0.10		mg/L	05/12/2000	0.10	keh	771 1753	SW 8270C
Surr: Nitrobenzene-d5	76.0		*	05/12/2000	27-118	keh	771 1753	SW 8270C
Surr: 2-Fluorobiphenyl	74.0		8	05/12/2000	29-109	keh	771 1753	SW 8270C
Surr: Terphenyl-d14	76.0		%	05/12/2000	31-123	keh	. 771 1753	SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100

Sample No. : 577726

05/15/2000

LaGrange, IL 60525

Job No.: 00.04376

Sample Description:

Cool Tank Soil (Grab) Sheffield STL

Date Taken: 04/28/2000

Date Received: 05/01/2000 Time Received: 16:00

Time Taken:

WDNR Cert. No. 999447130

IEPA Cert. No. 100221

				Date	Reporting		Batch 1	No.	Analytical
Parameter	Result	Flag	Units	Analyzed	Limit	Analyst	Prep/Ru	ın	Method
TCLP, ZHE Volatiles Prep	Leached			05/02/2000		kmb	728		SW 1311
TCLP Organic Prep	Leached			05/02/2000		kmb	6:	17	SW 1311
Prep, BNA Extract (TCLP)	Extracted	i		05/04/2000		jjh	771		SW 3510C
TCLP-ACID COMPOUNDS 8270									
TCLP-Cresols, Total	<0.10		mg/L	05/11/2000	0.10	keh ·	771 1	752	SW 8270C
TCLP-o-Cresol	<0.10		mg/L	05/11/2000	0.10	keh	771 1	752	SW 8270C
TCLP-m&p Cresol	<0.10		mg/L	05/11/2000	0.10	keh	771 1	752	SW 8270C
TCLP-Pentachlorophenol	<0.50		mg/L	05/11/2000	0.50	keh	771 1	752	SW 8270C
TCLP-2,4,5-Trichlorophenol	<0.50		mg/L	05/11/2000	0.50	keh	771 1	752	SW 8270C
TCLP-2,4,6-Trichlorophenol	<0.10		mg/L	05/11/2000	0.10	keh	771 1	752	SW 8270C
Surr: Phenol-d6	35.0	•	황	05/11/2000	6-59	keh	771 1	752	SW 8270C
Surr: 2-Fluorophenol	47.5		왕	05/11/2000	12-81	keh	771 1	752	SW 8270C
Surr: 2,4,6-Tribromophenol	71.5		윰	05/11/2000	27-137	keh	771 1	752	SW 8270C



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525

05/15/2000

Sample No. : 577726

Job No.: 00.04376

Sample Description: Cool Tank Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000 Time Taken: IEPA Cert. No. 100221

Date Received: 05/01/2000 Time Received: 16:00 WDNR Cert. No. 999447130

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batc Prep	h No. /Run	Analytical Method
TCLP-VOLATILES 8260									
TCLP-Benzene	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-Carbon Tetrachloride	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-Chlorobenzene	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-Chloroform	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-1,2-Dichloroethane	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-1,1-Dichloroethene	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-Methyl Ethyl Ketone	<2.0		mg/L	05/05/2000	0.40	mjo	728	3599	SW 8260B
TCLP-Tetrachloroethene	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
TCLP-Trichloroethene	<0.10		mg/L	05/05/2000	0.020	mjο	728	3599	SW 8260B
TCLP-Vinyl Chloride	<0.10		mg/L	05/05/2000	0.020	mjo	728	3599	SW 8260B
Surr: Dibromofluoromethane	106.0		ક	05/05/2000	77-121	πjo	728	3599	SW 8260B
Surr: Toluene-d8	102.0		ક	05/05/2000	85-115	mjo	728	3599	SW 8260B
Surr: Bromofluorobenzene	102.0		そ	05/05/2000	76-120	mjo	728	3599	SW 8260B



Ms. Sarah Monette HUFF & HUFF INC. 512 West Burlington

Suite 100 LaGrange, IL 60525 05/15/2000

Sample No. : 577726

Job No.: 00.04376

Sample Description: Cool Tank Soil (Grab)

Sheffield STL

Date Taken: 04/28/2000

Date Received: 05/01/2000

Time Received: 16:00

Time Taken: WDNR Cert. No. 999447130 IEPA Cert. No. 100221

Parameter	Result	Flag	Units	Date Analyzed	Reporting Limit	Analyst	Batch No. Prep/Run	Analytical Method
TCLP BASE NEUTRAL COMPOUNDS		•						
TCLP-1,4-Dichlorobenzene	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
TCLP-Hexachloroethane	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
TCLP-Nitrobenzene	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
TCLP-Hexachlorobutadiene	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
TCLP-2,4-Dinitrotoluene	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
TCLP-Hexachlorobenzene	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
TCLP-Pyridine	<0.10		mg/L	05/11/2000	0.10	keh	771 1752	SW 8270C
Surr: Nitrobenzene-d5	75.0		왕	05/11/2000	27-118	keh	771 1752	SW 8270C
Surr: 2-Fluorobiphenyl	71.0		ક	05/11/2000	29-109	keh	771 1752	SW 8270C
Surr: Terphenyl-d14	94.0		ક	05/11/2000	31-123	keh	771 1752	SW 8270C



CONTINUING CALIBRATION VERIFICATION

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette 05/15/2000

Job Number: 00.04376

Daraluna	Run Batch Number	CCV True Conc.	Conc. Found	Percent Recovery
Analyte	ишшег	cone.	round	Kecovery
TCLP-Arsenic, ICP	4923	2.00	2.07	103.5
TCLP-Barium, ICP	4924	2.00	1.97	98.5
TCLP-Cadmium, ICP	5809	1.00	0.980	98.0
TCLP-Chromium, ICP	4913	2.00	1.98	99.0
TCLP-Lead, ICP	5118	2.00	1.96	98.0
TCLP-Mercury, CVAA	1372	0.0025	0.00253	101.2
TCLP-Selenium, ICP	4729	2.00	1.96	98.0
TCLP-ACID COMPOUNDS 8270				
TCLP-2,4,6-Trichlorophenol	1752	50.0	51.0	102.0
TCLP-ACID COMPOUNDS 8270				
TCLP-2,4,6-Trichlorophenol	1753	50.0	52.0	104.0
TCLP-VOLATILES 8260				
TCLP-Benzene	3598	50.0	47.0	94.0
TCLP-Chloroform	3598	50.0	52.0	104.0
TCLP-1,1-Dichloroethene	3598	50.0	49.0	98.0
TCLP-Vinyl Chloride	3598	50.0	42.0	84.0
TCLP-VOLATILES 8260				
TCLP-Benzene	3599	50.0	47.0	94.0
TCLP-Chloroform	3599	50.0	53.0	106.0
TCLP-1,1-Dichloroethene	3599	50.0	54.0	108.0
TCLP-Vinyl Chloride	3599	50.0	47.0	94.0
TCLP BASE NEUTRAL COMPOUNDS		50.0	4.2 . 0	26.0
TCLP-1,4-Dichlorobenzene	1752	50.0	48.0	96.0
TCLP-Hexachlorobutadiene	1752	50.0	52.0	104.0
TCLP BASE NEUTRAL COMPOUNDS				
TCLP-1,4-Dichlorobenzene	1753	50.0	47.0	94.0
TCLP-Hexachlorobutadiene	1753	50.0	44.0	88.0

CCV - Continuing Calibration Verification



BLANK ANALYSIS

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette

05/15/2000

Job Number: 00.04376

Analyte	Prep Batch Number	Run Batch Number	Blank Analysis Results	Units	Reporting Limit	Analytical Method
TCLP-Arsenic, ICP	3097	4923	<0.20	mg/L	0.20	SW 6010B
TCLP-Arsenic, ICP	3097	4923	<0.20	mg/L	0.20	SW 6010B
TCLP-Barium, ICP	3097	4924	<0.020	mg/L	0.020	SW 6010B
TCLP-Barium, ICP	3097	4924	<0.020	mg/L	0.020	SW 6010B
TCLP-Cadmium, ICP	3097	5809	<0.010	mg/L	0.010	SW 6010B
TCLP-Cadmium, ICP	3097	5809	<0.010	mg/L	0.010	SW 6010B
TCLP-Chromium, ICP	3097	4913	<0.040	mg/L	0.040	SW 6010B
TCLP-Chromium, ICP	3097	4913	<0.040	mg/L	0.040	SW 6010B
TCLP-Lead, ICP	3097	5118	<0.100	mg/L	0.100	SW 6010B
TCLP-Lead, ICP	3097	5118	<0.200	mg/L	0.200	SW 6010B
TCLP-Mercury, CVAA	1517	1372	<0.0002	mg/L	0.0002	SW 7470A
TCLP-Selenium, ICP	3097	4729	<0.20	mg/L	0.20	SW 6010B
TCLP-Silver, ICP	3097	5128	<10	ug/L	10	SW 6010B
TCLP-Silver, ICP	3097	5128	<0.040	mg/L	0.040	SW 6010B
TCLP-Silver, ICP	3097	5128	<0.050	mg/L	0.050	SW 6010B
TCLP-ACID COMPOUNDS 8270						SW 8270C
TCLP-o-Cresol	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-m&p Cresol	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-Pentachlorophenol	771	1750	<0.50	mg/L	0.50	SW 8270C
TCLP-2,4,5-Trichlorophenol	771	1750	<0.50	mg/L	0.50	SW 8270C
TCLP-2,4,6-Trichlorophenol	771	1750	<0.10	mg/L	0.10	SW 8270C
Surr: Phenol-d6	771	1750	38.0	¥	6-59	SW 8270C
Surr: 2-Fluorophenol	771	1750	52.5	%	12-81	SW 8270C
Surr: 2,4,6-Tribromophenol	771	1750	96.5	ક	27-137	SW 8270C
TCLP-VOLATILES 8260						SW 8260B
TCLP-Benzene		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-Carbon Tetrachloride		3598	<1.0	ug/L	1.0	SW 8260B
				-		

Advisory Control Limits for Blanks:

All compounds should be less than the Reporting Limit, except for phthalate esters, toluene, methylene chloride, acetone and chloroform should be less than 5 times the Reporting Limit.



BLANK ANALYSIS

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette 05/15/2000

Job Number: 00.04376

	Prep	Run	Blank			
	Batch	Batch	Analysis		Reporting	Analytical
Analyte	Number	Number	Results	Units	Limit	Method
TCLP-Chlorobenzene		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-Chloroform		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-1,4-Dichlorobenzene		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-1,2-Dichloroethane		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-1,1-Dichloroethene		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-Methyl Ethyl Ketone		3598	<20	ug/L	20	SW 8260B
TCLP-Tetrachloroethene		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-Trichloroethene		3598	<1.0	ug/L	1.0	SW 8260B
TCLP-Vinyl Chloride		3598	<2.0	ug/L	2.0	SW 8260B
Surr: Dibromofluoromethane		3598	102.0	솸	75-124	SW 8260B
Surr: Toluene-d8		3598	102.0	8	84-115	SW 8260B
Surr: Bromofluorobenzene		3598	98.0	8	79-122	SW 8260B
TCLP-VOLATILES 8260						SW 8260B
TCLP-Benzene		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-Carbon Tetrachloride		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-Chlorobenzene		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-Chloroform		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-1,4-Dichlorobenzene		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-1,2-Dichloroethane		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-1,1-Dichloroethene		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-Methyl Ethyl Ketone		3599	<20	ug/L	20	SW 8260B
TCLP-Tetrachloroethene		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-Trichloroethene		3599	<1.0	ug/L	1.0	SW 8260B
TCLP-Vinyl Chloride		3599	<2.0	ug/L	2.0	SW 8260B
Surr: Dibromofluoromethane		3599	104.0	*	75-124	SW 8260B
Surr: Toluene-d8		3599	100.0	¥	84-115	SW 8260B
Surr: Bromofluorobenzene		3599	100.0	४	79-122	SW 8260B

Advisory Control Limits for Blanks:

All compounds should be less than the Reporting Limit, except for phthalate esters, toluene, methylene chloride, acetone and chloroform should be less than 5 times the Reporting Limit.



BLANK ANALYSIS

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette 05/15/2000

Job Number: 00.04376

	Prep	Run	Blank			
	Batch	Batch	Analysis		Reporting	Analytical
Analyte	Number	Number	Results	Units	Limit	Method
TOTAL DATA VENEZULA GOVERNO						ou 2222
TCLP BASE NEUTRAL COMPOUNDS						SW 8270C
TCLP-1,4-Dichlorobenzene	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-Hexachloroethane	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-Nitrobenzene	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-Hexachlorobutadiene	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-2,4-Dinitrotoluene	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-Hexachlorobenzene	771	1750	<0.10	mg/L	0.10	SW 8270C
TCLP-Pyridine	771	1750	<0.10	mg/L	0.10	SW 8270C
Surr: Nitrobenzene-d5	771	1750	73.0	ક	27-118	SW 8270C
Surr: 2-Fluorobiphenyl	771	1750	77.0	*	29-109	SW 8270C
Surr: Terphenvl-d14	771	1750	94.0	%	31-123	SW 8270C

Advisory Control Limits for Blanks:

All compounds should be less than the Reporting Limit, except for phthalate esters, toluene, methylene chloride, acetone and chloroform should be less than 5 times the Reporting Limit.



LABORATORY CONTROL STANDARD

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette 05/15/2000

Job Number: 00.04376

	Prep	Run			
	Batch	Batch	True	Conc.	LCS
Analyte	Number	Number	Conc.	Found	% Recovery
TCLP-Arsenic, ICP	3097	4923	0.500	0.544	108.8
TCLP-Arsenic, ICP	3097	4923	0.500	0.544	108.8
TCLP-Barium, ICP	3097	4924	0.500	0.496	99.2
TCLP-Barium, ICP	3097	4924	0.500	0.496	99.2
TCLP-Cadmium, ICP	3097	5809	0.500	0.505	101.0
TCLP-Cadmium, ICP	3097	5809	0.500	0.505	101.0
TCLP-Chromium, ICP	3097	4913	0.500	0.505	103.2
•				0.516	103.2
TCLP-Chromium, ICP	3097	4913	0.500		
TCLP-Lead, ICP	3097	5118	0.500	0.507	101.4
TCLP-Lead, ICP	3097	5118	0.500	0.507	101.4
TCLP-Mercury, CVAA	1517	1372	0.0025	0.00241	96.4
TCLP-Selenium, ICP	3097	4729	0.500	0.497	99.4
TCLP-Silver, ICP	3097	5128	500	479	95.8
TCLP-Silver, ICP	3097	5128	0.500	0.479	95.8
TCLP-Silver, ICP	3097	5128	0.500	0.479	95.8
TCLP-ACID COMPOUNDS 8270					
TCLP-o-Cresol	771	1750	80	63	78.8
TCLP-m&p Cresol	771	1750	80	63	78.8
TCLP-Pentachlorophenol	771	1750	80	77	96.3
TCLP-2,4,5-Trichlorophenol	771	1750	80	77	96.3
TCLP-2,4,6-Trichlorophenol	771	1750	80	76	95.0
Surr: Phenol-d6	771	1750	200	87	43.5
Surr: 2-Fluorophenol	771	1750	200	117	58.5
Surr: 2,4,6-Tribromophenol	771	1750	200	204	102.0
.					



LABORATORY CONTROL STANDARD

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette 05/15/2000

Job Number: 00.04376

	Prep	Run			
	Batch	Batch	True	Conc.	LCS
Analyte	Number	Number	Conc.	Found	% Recovery
TCLP-VOLATILES 8260					
TCLP-Benzene		3598	20.0	20.0	100.0
TCLP-Chlorobenzene		3598	20.0	22.0	110.0
TCLP-1,1-Dichloroethene		3598	20.0	22.0	110.0
TCLP-Trichloroethene		3598	20.0	22.0	110.0
Surr: Dibromofluoromethane		3598	50.0	52.0	104.0
Surr: Toluene-d8		3598	50.0	51.0	102.0
Surr: Bromofluorobenzene		3598	50.0	55.0	110.0
TCLP-VOLATILES 8260					
TCLP-Benzene		3599	20.0	21.0	105.0
TCLP-Chlorobenzene		3599	20.0	21.0	105.0
TCLP-1,1-Dichloroethene		3599	20.0	24.0	120.0
TCLP-Trichloroethene		3599	20.0	19.0	95.0
Surr: Dibromofluoromethane		3599	50.0	51.0	102.0
Surr: Toluene-d8		3599	50.0	50.0	100.0
Surr: Bromofluorobenzene		3599	50.0	50.0	100.0
TCLP BASE NEUTRAL COMPOUNDS					
TCLP-1,4-Dichlorobenzene	771	1750	80	46	57.5
TCLP-Hexachloroethane	771	1750	80	41	51.3
TCLP-Nitrobenzene	771	1750	80	72	90.0
TCLP-Hexachlorobutadiene	771	1750	80	38	47.5
TCLP-2,4-Dinitrotoluene	771	1750	80	72	90.0
TCLP-Hexachlorobenzene	771	1750	80	76	95.0
TCLP-Pyridine	771	1750	80	42	52.5
Surr: Nitrobenzene-d5	771	1750	100	84	84.0
Surr: 2-Fluorobiphenyl	771	1750	100	80	80.0
Surr: Terphenyl-d14	771	1750	100	98	98.0
Dall. Perpindings dra	. , -	2,70	200	20	20.0



MATRIX SPIKE/MATRIX SPIKE DUPLICATE

HUFF & HUFF INC. 512 West Burlington Suite 100 LaGrange, IL 60525 Ms. Sarah Monette 05/15/2000

Job Number: 00.04376

Analyte	Prep Batch Number	Run Batch Number	Matrix Spike Result	Sample Result	Spike Amount	Units	Percent Recovery	MSD Result	MSD Spike Amount	Units	Percent Recovery	MS/MSD RPD
TCLP-Cadmium, ICP	3097	5809	0.461	<0.005	0.500	mg/L	92.2	0.467	0.500	mg/L	93.4	1.3
TCLP-Chromium, ICP	3097	4914	0.480	<0.040	0.500	mg/L	96.0	0.495	0.500	mg/L	99.0	3.1
TCLP-Mercury, CVAA	1517	1372	0.00238	<0.0002	0.0025	mg/L	95.2	0.0023	0.0025	mg/L	92.8	2.6
TCLP-VOLATILES 8260												
TCLP-Benzene		3598	1.8	<1.0	20.0	ug/L	90.0	18	20.0	ug/L	90.0	0.0
TCLP-Chlorobenzene		3598	19	<1.0	20.0	ug/L	95.0	18	20.0	ug/L	90.0	5.4
TCLP-1,1-Dichloroethene		3598	20	<1.0	20.0	ug/L	100.0	20	20.0	ug/L	100.0	0.0
TCLP-Trichloroethene		3598	21	<1.0	20.0	ug/L	105.0	20	20.0	ug/L	100.0	4.9

NOTE: Matrix Spike Samples may not be samples from this job.

Advisory Control Limits for MS/MSDs:

For Inorganic Parameters and GC Volatiles, the spike recovery should be 75 - 125% if the spike added value was greater than or equal to one fourth of the sample result value. If not, the control limits are not established. The RPD for the MS/MSD pair should be less than 20.

MS = Matrix Spike

MSD = Matrix Spike Duplicate

RPD - Relative Percent Difference

RPD calculations are performed on the Percent Recovery calculated from the observed Matrix spike and Matrix Spike Duplicate results.

Page 22 of 22



TestAmerica, Bartlett Division

KEY TO ABBREVIATIONS and METHOD REFERENCES

<	: Less than; When appearing in the results column indicates the analyte was not detected at or above the reported value.
mg/L	 Concentration in units of milligrams of analyte per liter of sample. Measurement used for aqueous samples. Can also be expressed as parts per million (ppm).
ug/g	: Concentration in units of micrograms of analyte per gram of sample. Measurement used for non-aqueous samples. Can also be expressed as parts per million (ppm) or mg/Kg.
ug/L	: Concentration in units of micrograms of analyte per liter of sample. Measurement used for aqueous samples. Can also be expressed as parts per billion (ppb).
ug/Kg	: Concentration in units of micrograms of analyte per kilogram of sample. Measurement used for non-aqueous samples. Can also be expressed as parts per billion (ppb).
TCLP	: These initials appearing in front of an analyte name indicate that the Toxicity Characteristic Leaching Procedure (TCLP) was performed for this test.
Surr:	: These initials are the abbreviation for surrogate. Surrogates are compounds that are chemically similar to the compounds of interest. They are part of the method quality control requirements.
%	: Percent; To convert ppm to %, divide the result by 10,000. To convert % to ppm, multiply the result by 10,000.
ICP	: Indicates analysis was performed using Inductively Coupled Plasma Spectroscopy.
AA	: Indicates analysis was performed using Atomic Absorption Spectroscopy.
GFAA	: Indicates analysis was performed using Graphite Furnace Atomic Absorption Spectroscopy.
PQL	: Practical Quantitation Limit; the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions.
Method Refe	erences
(1)	Methods 1000 through 9999: see "Test Methods for Evaluating Solid Waste", USEPA SW-846, 3rd Edition, 1986.
(2)	ASTM "American Society for Testing Materials"
(3)	Methods 100 through 499: see "Methods for Chemical Analysis of Water and Wastes", USEPA, 600/4-79-020, Rev. 1983.
(4)	See "Standard Methods for the Examination of Water and Wastewater", 17th Ed, APHA, 1989.
(5)	Methods 600 through 625: see "Guidelines Establishing Test Procedures for the Analysis of Pollutants", USEPA Federal Register Vol. 49 No. 209, October 1984.
(6)	Methods 500 through 599: see "Methods for the Determination of Organic Compounds in Drinking Water," USEPA 600/4-88/039, Rev. 1988.
(7)	See "Methods for the Determination of Metals in Environmental Samples", Supplement I

EPA-600/R-94/111, May 1994.



(8)	See "Standard Methods for the Examination of Water and Wastewater", 18th Ed., APHA, 1992.
(9)	Methods 1000 through 9999: see "Test Methods for Evaluating Solid Waste", USEPA SW-846, 3rd Edition, 1986, Including Updates I and II.
(10)	This method is from the 2nd Edition of "Test Methods for Evaluating Solid Waste", USEPA SW-846. It has been dropped from the 3rd Edition, 1986.

Chain of Custe Recor	d				ii .	S'				A	M	u Ja								Pa	g	<u> </u>	f
☐ Atlanta, GA (B) ☐	Bartlett, IL ((630) 289-31 Brighton, CC (303) 659-04	.) 00. D(Œ) Œ	319) 277-24	01 SC (F) 🗇	Charlotte, N (704) 392-1 Columbia, S (803) 796-8	164 SC (H)	(93	yton, OH 7) 294-68 venport. I 19) 323-7	356 A (J)	(910) India	berton, N 738-619 napolis, 842-426	0 IN (L)	(61	shville, 5) 726- con, Gz 2) 757-	0177 A (N)		(2- D Or	48) 33 lando	MI (O) 32-1940 ; FL (P) 31-2560	(8) □ W	ekford. 15) 874 atertown 20) 261-	-2171 a.WI (R	Çı
Client HUFF (HUF	- Carriera Carriera	Project 1	No.: <	MA	p STL			1	REQU	JEST	ED P	ARAI	MET.	ERS									
Report Address:			Address:					/)	// X	2/	/*	:/	7	7	/	7	7	/	7			. 13.	
IAORANGE II	_			1 : - 1 ?							/ 4	e/				/			regulat	work bein ory	_		
LAGRANGE, IL		Attn:	STM				/	Con Waller	' y/	/ /		/	′ /	/		/,	/		-	ance mon	-		
Phone No.: 18579 5	310		I By: ST	7A /1				W.	\mathcal{Y}_{n}		W				/				Is this regulat	work bein pry enforc No	g condu :ement a	eted for letion?	
Fax No.: 4085793	F2/	P.O. No			,=		2	(Y) (/ 8									Yes_X	No			
		Quote N	\ X_	335	?	1 /	$\setminus Q$		7		" /	/	/	/ ,			,			regulation NP			
TURNAROUND TIME		State San	nples Collect	ed /a		/	3/	Q/		· KY					,				UST_			ng Wate	:1
Standard	D.) Same		1/4	Y L	J\	/ 3	\{\ 									Other_			Non	ie
Rush (surcharges may apply)	Di	ate Needec	·				7	/		- /	\leftarrow		\leftarrow	 			pe of c						~~~~
Sample ID	Date	Time	Comp (C) Grab (G)	Matrix	Lab Use										E	Oug.	0N 08.1	She	None		REMA	RKS	
PANO WATER	04:28		6	W	000 (B) (\$0.00) (90.00) (80.00)	X	X												6				
	999																		i.				
DRUMACC SOIL			C,	S			X		X										2		,		
ORUMACE SOIL			G	S	150 (S. 1816) 25 (S. 1816)	X		OV	X	volu-	hle							orize conserta	2				
										147.54	1102												
66AM2 BOX SOIL			C	S			×		X										2	······			
6612 BOX SOIL	Congress of the Congress of th		G	S		X		Or	~~~~~	Vola	l-16							~~~	2			/	
CONTRACT SOFT			4	3	100000	1	 	1	7 0	VCNU			A		1					***************************************		A CONTRACTOR OF THE PARTY OF TH	Earness Communication Communic
Low Talk Coll			C	S			X		X			**************************************		<u> </u>					2				Prince was a second constant
COOLTANK SOIL	1		G	S		X	-	Or		vou	160								<u>~_</u> Z				
QC Deliverables: None	ا ا	evel 2 - Ba				+			/\ 	VOR	III C	avaerus nus na			+			<u></u> 		126) (· · · ·	1	
☐ Level		S. M. C. J. S. A. A.	Other	5 6 6			1777				7.7					Za 9	Init l	Lab T	emp	12		YUUL : Lab Te	<u>l</u> ice
						1	· I	. .		1	L consultations	1080815003985 <u>.</u>	<u> </u>	1 0.000 .		*************	·	115.5.115	**************************************	***************************************			4, 31, 41, 41, 41, 41, 41, 41, 41, 41, 41, 4
COMMENTS: *SEE A	MACH	もうつ	USTS	>																			
																	<u>-</u> -	12.4.	anga Proje				
Relinquished By: SUVU	MY	K	Janf-a	150		eceiver		-//	·				StaleCl		510	Tim	e L	ab u	SE ONI	.Y:		1.	
Relinquished By			55420	1/600	Time I	Received	ву: Р	Mer	ril	l			3101	∞	160	A)	e 📑						
Relinquished By:			Date	1	Time 1	Received	l By:		··				Date			Tim	e (Insto	dy Seal:	O yes		S 7	J _{N/A}
Reunguishea By			Date	1	Time I	Received	Ву:						Date			Tim	ì			ed by TA:	_amgi	\	1.

APPENDIX C

LARAWAY RDF

PAGE 01/01

\$533.14

23.180

20.00

GTS 100 LARAWAY RECYCLING & DISPOSAL PACILITY 12-14-00 1:49 PM Profile Detail Report Date Range: 05/01/2000 - 06/30/2000 All Trucks, Customer:0000146, Profile:PE7641 Ticket / Commodity -Manifest Date Time Out Landfill Yarda Tons Total Fees Code Tkt Yds Fae Generator: SHEFFIELD STEEL Profile: P87841 Customer: SHEFFIELD STEEL - 0000146 5/24/2000 848819 5/24/2000 9:41:25 AM 20.00 23.180 \$**533.1**4 \$533.14 T 600 20.00

Joseph Color

Ticket Count:

6302570648;

May-22-00 8:11AM;

Page 2/4

20 o z

ant By: SUPERIOR SPECIAL SERVICES;

3. 1

SHEFFIELD STREL 8302670648: Way-1

May-17-00 17:14AM;

Paga 2/3







	GENER	lator's was	TE PROFILE	SHEET OF
	1 kg pm 1 14 pm 1		Profes Number:	PB7441
		NE PRINT DE DE COUTYPE		7700
			Front Bany	
				//- 22-00
l. Courte Marc	SUERFIELD	Street Cours 2	SC Cake	
3. Paddy Street Address	E OUE INDUST	RV AVENUE 4.		b = 4830
J. Receip Chy: 7	DAILE!	&		
7. 2000 000	GONTAN	8.		
	<u> </u>	19.	entrole Da	[वेगठपङ्खान
11. Common News	914/01-27			2677VB-4972
	24 36770	AR IL BOYDY	of Ri	3_740.4400
		411 45 407 24		
4. Not West		<u> </u>		
A. Process Company	S COREAL	CATAND P		
				pickary service and the service servic
0, 45		4 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		
Black	39 57 7			
				b. 24: 200
			strong	
	management of the commence of		- A STATE OF THE PROPERTY OF T	
		DENIM DIE		
j. Protest and Cooker	A COMPANIE Quad a			<u> </u>
- 304. Pag	*			
014	7 7-10			
	7.7		1	
	,			
	1 Drymans			
). Šāža				
	4 4 4 4 44 4 44 4 4 4 4 4 4 4 4 4 4 4		And Andrew Assets Street	
			2	TYPE (1940)
a. Desirable states resident		BAG 2000 A		
# FEL		anna anna anna 200 62 62 64 64 64 64 64 64 64 64 64 64 64 64 64		
	ون فالعم ينبغ بط في الله فالعم ينبغ بط	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ne qualine XIIAA	
ym, anaroin				
p. lida yez yanga a		Tid for heater or was	A @ \$\)	
			yar.	
1. Day for many 4889		1	4 64 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	THE STATE OF THE S
			/ 1-751	
. Character of Wheel	and and and an	್ ಫ್ರೆಫ್ಫ್ಫ್ಫ್ ಫ್ರಿಫ್ಫ್ಫ್ ಫ್ರ್ಫ್ಫ್ಫ್ಫ್ ಫ್ರ್ಫ್ಫ್ಫ್ ಫ್ರ್ಫ್ಫ್ಫ್ಫ	o de del de de de 44 de menor per en mais en manda de	Stoods.
	12-15		Yarda (Circum Circum)	
				ANEXAN COMPANY COMPANY CONTRACTOR OF THE PROPERTY OF THE PROPE
	a Chillen D	me gaz		
L Things In the same	U-Si			
c hessell Dy		(UZZON) Samedone Manyle	7 (Ta. 44) 4. 1. 124 L	ENDO
		des processors and the second		
as museofficeating abbin at 46 feetborgsgaggagg	The state of the s			
0165 & 3/4) ************************************	endi seaf		1390: 1:00K
-,	96G)	. 455 a 450 4	The Person of the Person	second is "Man as as

BAZ FORT ALL TSPU is approvator 調金製 the American State of 1 - vp to reduce 4 として こともし Q (Rugtion, The sand state of the same and D150024 q 25-7260 NO DOLMY!

ent By: SUPERIOR SPECIAL SERVICES;

C302470041

6302570648;

SHEFFIRED STEEL

May-17-00 11:14AM;

de ses

May-22-00 8:11AN;

Page 3/4 **6**

en me spec proj dust save

Sop. 19, 1938

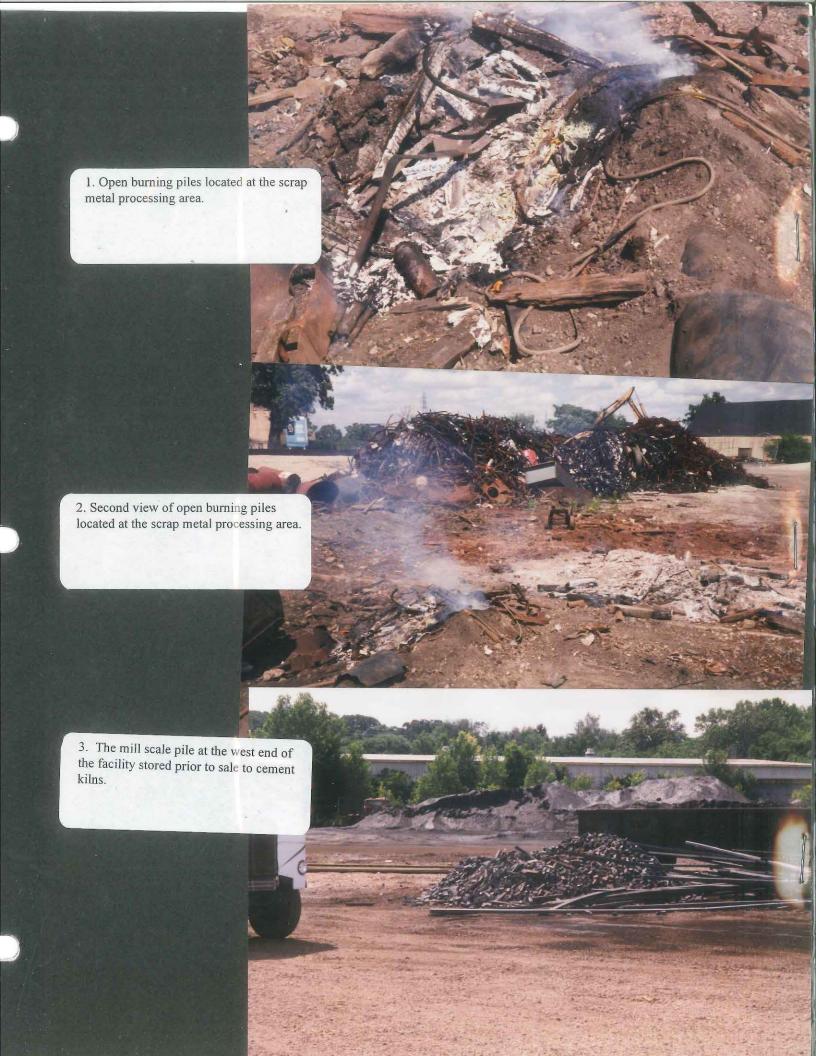


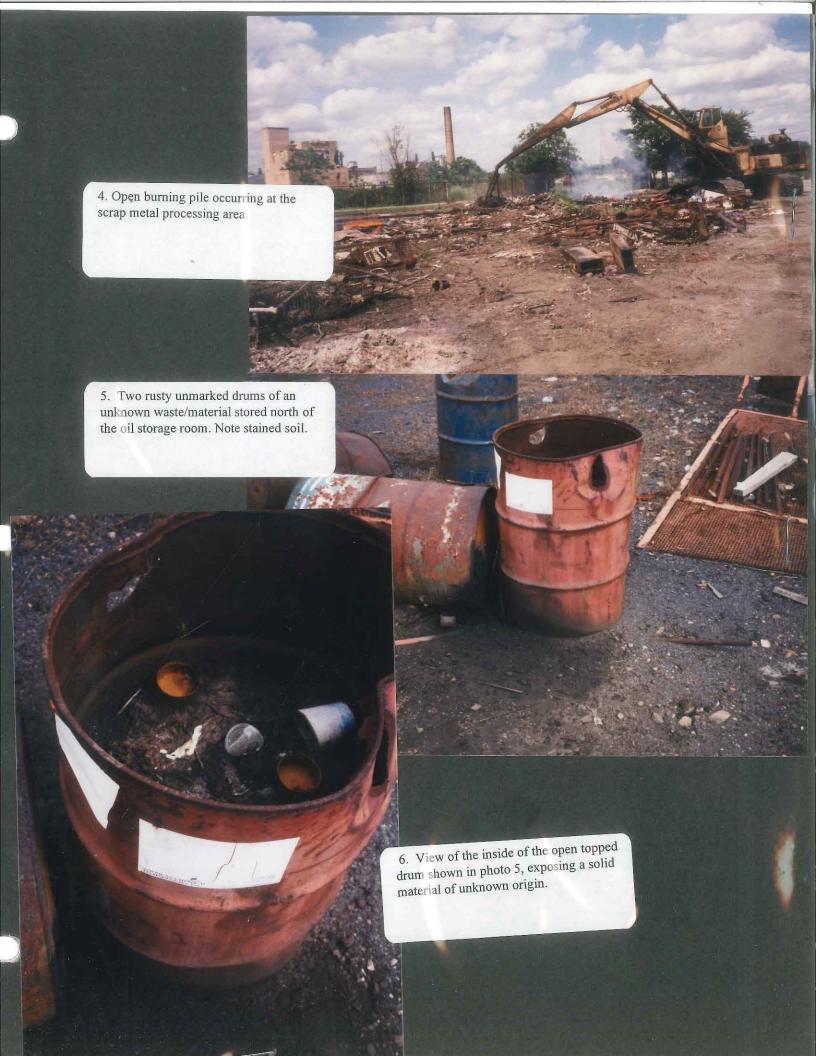
Waste Management of IL, Inc. Special Waste Group 5245 W. 38th Street Cicero, IL 60804 (708) 222-5056, fax (708) 656-0684

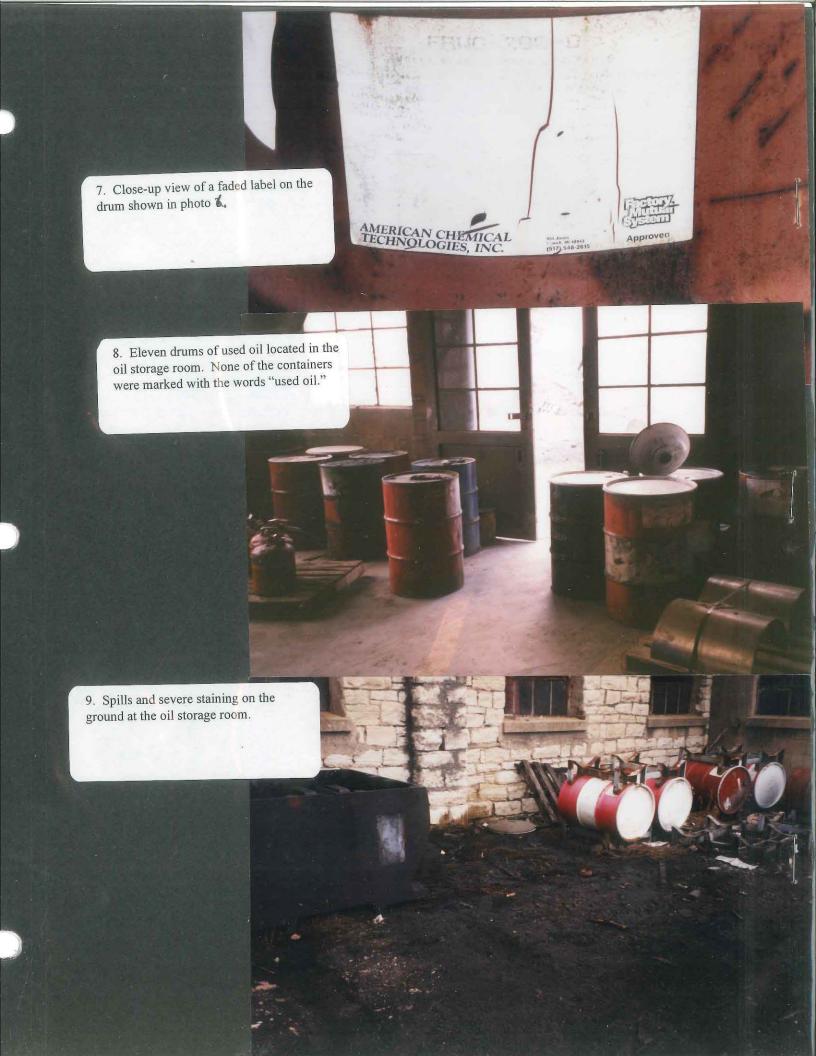
Exhibit A

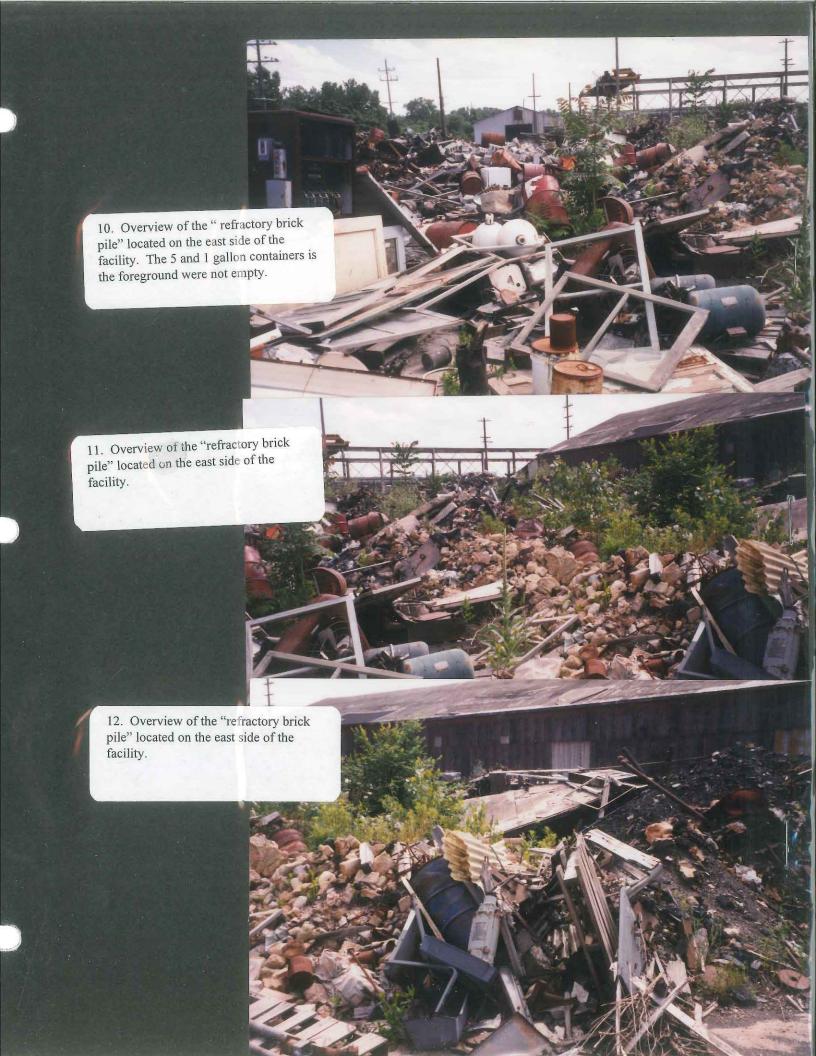
Š	Name: Shoffield Steel Corp			
E	Address: One Industry Avenue			
R	Alexandro Figure 1 12 and 17 a		27-772-Q-1-04-1-04-04-04-04-04-04-04-04-04-04-04-04-04-	THE RESIDENCE OF THE PROPERTY
V	City: Joliet	State: IL	Zip: 6	0434
ľ	Contact: Joe Zono - Sheffield Ste			×
C	Phone: (815) 740-4920			GENERAL STATEMENT AND
E	Fax: (815) 740-4909		2000	
		,		**************************************
W	este Name: oil contaminated soll	Profile: P	B7641	Facility: Laraway
	The state of the s	Third control of the		
B	Name: Sheffield Steel			
I	Address: P.O. Box 727		- Vin Gold day element and object of the Control of	
L		a description and a second second	Other Corner	
L	City: Joliet	State: IL	Zip: 604	34
1	Contact: Joe Zotto	4		
	Phone: (815) 740-4920	1777F-1116772		
G	Fax: (813) 740-4909			
		26.0.2		
	Description sposal oil contaminate		Rate	
	PM	ed soil	\$ 23.00 / to	PT
	ecial Conditions of Sale:	ed soil	\$23.00 / 16	
	PM	ed soil	\$ 23.00 / to	
Sp	PM	strument required by West 45 days. Incum. Trage charge of \$65.00 or will be billed at 15 cul	Taxabi	of Illinois, Inc.
Te	rms of Sale: Net 30 days and as secured by any in Late fee of 1 1/2% will be charged after All loads will be billed at 4 tons mining transportation is provided, a demunial loads transported in a dump trailer	strument required by West 45 days. Imum. Trage charge of \$65.00 or will be billed at 15 cul.	Taxabi	of Illinois, Inc. thalf-hour will be applied, and

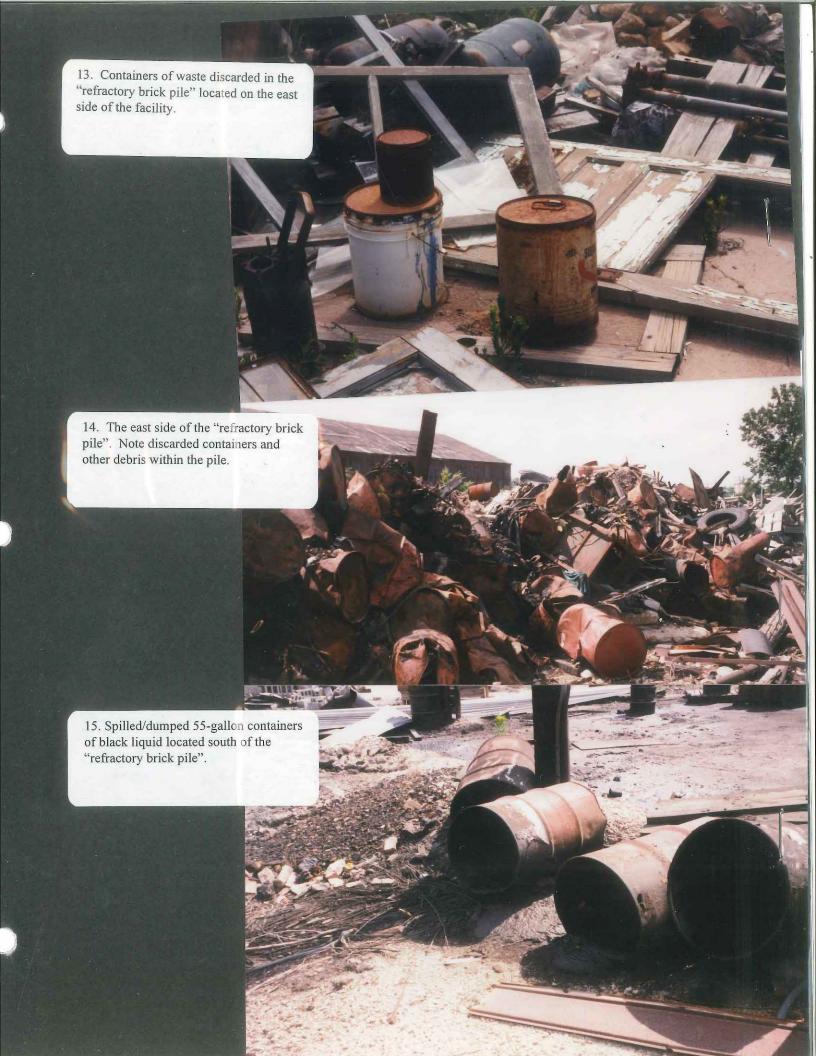
HEA	SE TYPE (Form designed for jee on also (12-jee) (15-jee)		My. J. S.	and all from the production comments		9 No. 2000-000	THE RESERVE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN THE PER
	WASTE MANIFEST NA	6	500mmar 140.	8 9	NO 1 Promose	hon in the mined by Federalism, I	ed areas to bestupes el sec
Э.	Generator's Name and Malling Address Location if C	Morent					
	ONE INDUSTRY PRIVE					ı C	1845
4	*24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS & 3	OPET 1500			1		
5.	SUPERIOR SPECIAL SERVICES (WID	US EPA ID Numb	or . The			144	de la
7.	Transporter 2 Company Name 8.	US EPA ID Numb	CONTROL OF THE PROPERTY OF THE			*1)	10 1 <u>2</u> 11.
						\$2.5 \$2.5	
94.	Designated Facility Name and Site Address 10.	US EPA ID Numb	3.1			air i	
	910 SAK DRIVE			1			
		2 000474	1999				\$ (\$ 1.00)
11	I. US DOT Description (Including Proper Shipping Name, Hazard Class	s, and ID Number)	12. Conta	ainers	13. Total	14. Ball	Wiest Nis.
a.	NOW HAZAROUS, NOW ECTEA. REGULAT	re To	No.	Туре	Quantity	W.Vol 335	
	WATER AND OIL	u		L.	_	()	
b.	INVIEW VIND OIC		004		20770	13 1	19 8 1 4
						**	
							7. 10°
C.							
			, ,		1 1 1		, Mily State
d.	to Table to service masses and descriptions on the service ser				since the second second		0.682.5
							- 7
		5.					11.5
					***	7	41
						## T	, in .
1				(-5-5-2)			
15	. Special Handling Instructions and Additional Information		-				
	1 (5 6 6 6 115				•		
	70 C 00 112						
16	GENERATOR'S CERTIFICATION: I hereby declare that the contents of the	ls consignment are fully	and accurate	elv dascı	thed above by		-
	proper shipping name and are classified, packed, marked, and labeled, an according to applicable international and national government regulations.	d are in all respects in	proper condit	ion for tr	ansport by high	Nay	
	If I am a large quantity generator, I certify that I have a program in place to economically practicable and that I have selected the practicable method of the practicable method of the practicable method.						
	and luture threat to human health and the environment; OR, if I are a small select the best waste management method that is available to me and that		ive made a gr	od faith	effort to minimize	e my waste ge	neration and
1	Printed/Typed Name	Signature //	1-11-	-		Mont	Date h Day Ye
Ļ	T. Fredette	f 17 you		a Bertantente van die ste kan in	SINCE THE PROPERTY OF THE PROP	95	170
17	. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name	Signature		·			Date
4		-100	ر بم تسبيح			мот 0 5	h Day Ye
18	Transporter 2 Acknowledgement of Receipt of Materials				Wi		Date
	Printed/Typed Name	ignature				Monte	h Day Ye
19.	Discrepancy Indication Space	Communicates to press curious bridges to the figs which excepts	ing and the state of the second se	mo-multi-freeze	On home and work of the behind the state of		وسفادها
	Facility Owner or Operator: Certification of receipt of frazzerous managements		ікаўшк а дарада за падагада		CONTRACTOR OF THE PROPERTY OF	Sittle State Control of the St	······································
20	Printed/Typed Name	als covered by this n	PENNIOST OXCE	pras no	ned in Rem 19.	Month	Date Ve
20.	pr. 450	MODE:					
	gency is authorized to require, purposed by \$555 Norbead Standa, 1893 Chapter	2. Suction 1004 mad 2020 per day at yes				}	1

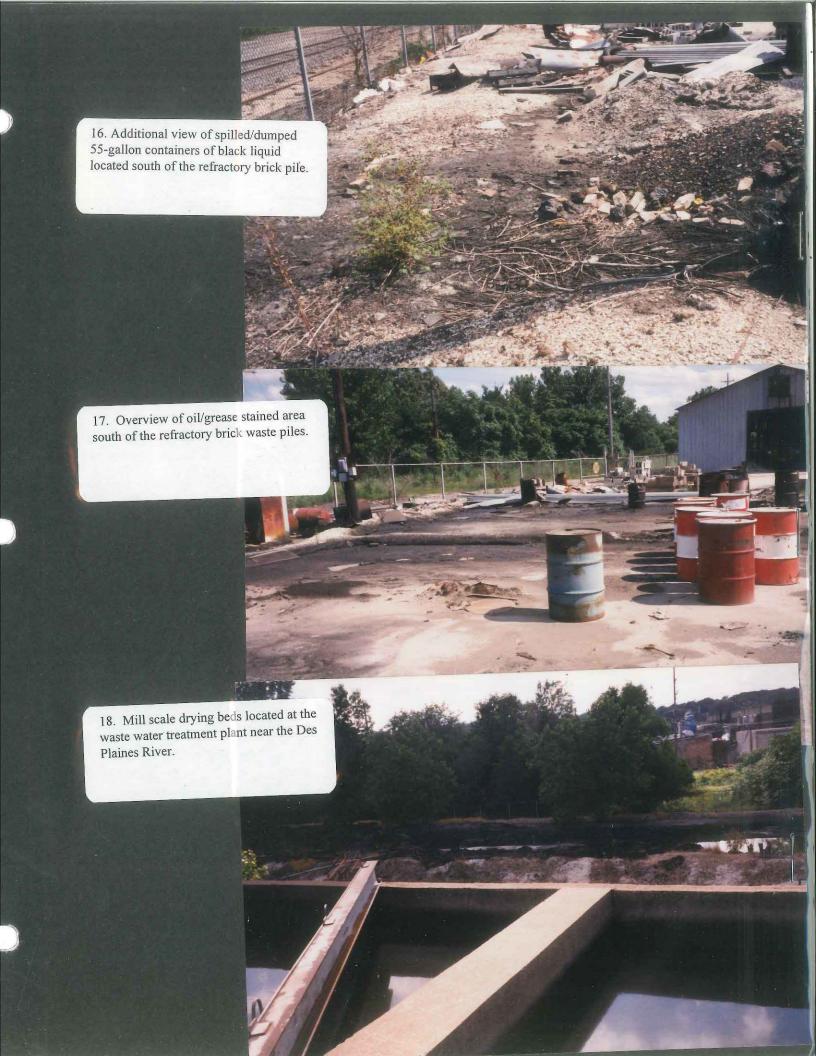






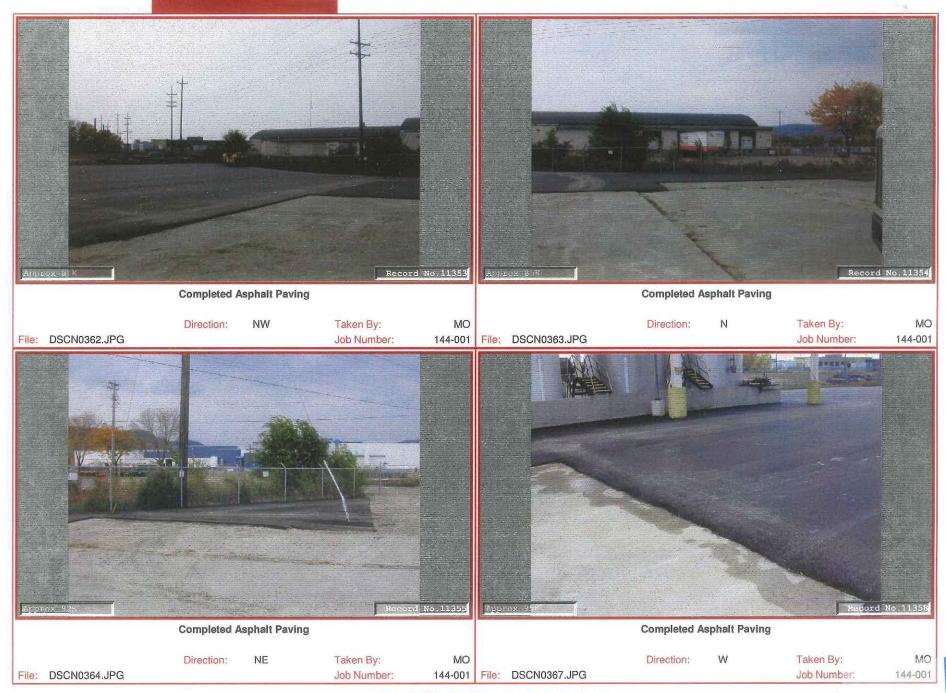












SITE REMEDIATION WORK PLAN CLEANING OF CONCRETE PAD SHEFFIELD STEEL CORP. JOLIET FACILITY USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp. Joliet, Illinois

prepared by:

Huff & Huff, Inc. James E. Huff, P.E. Sarah Monette, P.E.

January 18, 2000



HUFF & HUFF, INC. ENVIRONMENTAL CONSULTANTS LAGRANGE, ILLINOIS

TABLE OF CONTENTS

		Page
LIST	OF AC	RONYMSiii
1.	INTR	ODUCTION1 Remediation Objectives
	1.2 1.3	Project Organization and Key Personnel 1 Project Schedule 2
2.	CON	CRETE PAD3
3.	REMI	EDIATION APPROACH AND RATIONALE5
	3.1	Overview of Approach and Rationale5
	3.2	Cleaning Activities5
	3.3	Contaminants of Potential Interest5
4.	FIELI	PROCEDURES7
	4.1	Cleaning / Steam Rinse
	4.2	Sample Collection
	4.3	Sampling Handling and Identification
		4.3.1 Sample Preservation
		4.3.2 Sample Labels
		4.3.3 Sample Packing and Shipping
		4.3.4 Sample Custody9
	4.4	Equipment Decontamination9
	4.5	Documentation 9
5.	LABO	DRATORY ANALYSIS11
	5.1	Data Quality Goals11
	5.2	Analytical Methods and Detection Limits
6.	QUAI	LITY ASSURANCE PROJECT PLAN
		LIST OF TABLES
TABL	E	
	3-1	TCLP Parameters 6

LIST OF FIGURES

FIGURE	
2-1	Concrete Pad Location4
	LIST OF APPENDICES
APPENDIX	
A	Health and Safety Plan

LIST OF ACRONYMS

AQAP Analytical Quality Assurance Plan

IEPA Illinois Environmental Protection Agency

MS/MSD matrix spike / matrix spike duplicate

QA/QC quality assurance / quality control

RCRA Resource Conservation and Recovery Act

USEPA United States Environmental Protection Agency

1. INTRODUCTION

1.1 Remediation Objectives

This work plan addresses a petroleum-stained concrete pad at the Sheffield Steel facility located in Joliet, Illinois. The pad underlies the facility's "oil drum accumulation area," which is used to stage drums of non-hazardous waste grease and oil before off-site disposal. The staining was identified in August 1999, during a site inspection conducted by the United States Environmental Protection Agency (USEPA).

The objective of the proposed site remediation is to remove petroleum residues from the concrete pad. High-pressure steam cleaning will be used to clean the pad. The residues generated from cleaning will be analyzed to determine whether they are hazardous wastes as defined by the Resource Conservation and Recovery Act (RCRA). If the residues are hazardous wastes, then an additional work plan for closure of the concrete pad storage area will be submitted to the USEPA.

1.2 Project Organization and Key Personnel

The USEPA requested Sheffield Steel address the concrete pad in correspondence dated December 9, 1999. Sheffield Steel's legal counsel (Collier, Shannon, Rill & Scott) has retained Huff & Huff, Inc. (H&H) to prepare this work plan. Huff & Huff will work with an environmental contractor (to be determined) to perform the cleaning.

Key project personnel are:

Mr. Douglas Strickland	Sheffield Steel Corp.	Mgr. Of Env., Health & Safety
Mr. Frank DiFalco Mr. Ken Morris	Sheffield Steel Corp. Sheffield Steel Corp.	Operations Manager Maint. & Eng. Manager
Mr. John L. Wittenborn Mr. Jeffrey Longsworth	Collier, Shannon, Rill & Scott Collier, Shannon, Rill & Scott	Legal Counsel Legal Counsel

Mr. James E. Huff, P.E. Ms. Sarah Monette, P.E.

H&H Environmental Consultants H&H Environmental Consultants Principal Project Engineer

1.3 Project Schedule

The anticipated project schedule is as follows:

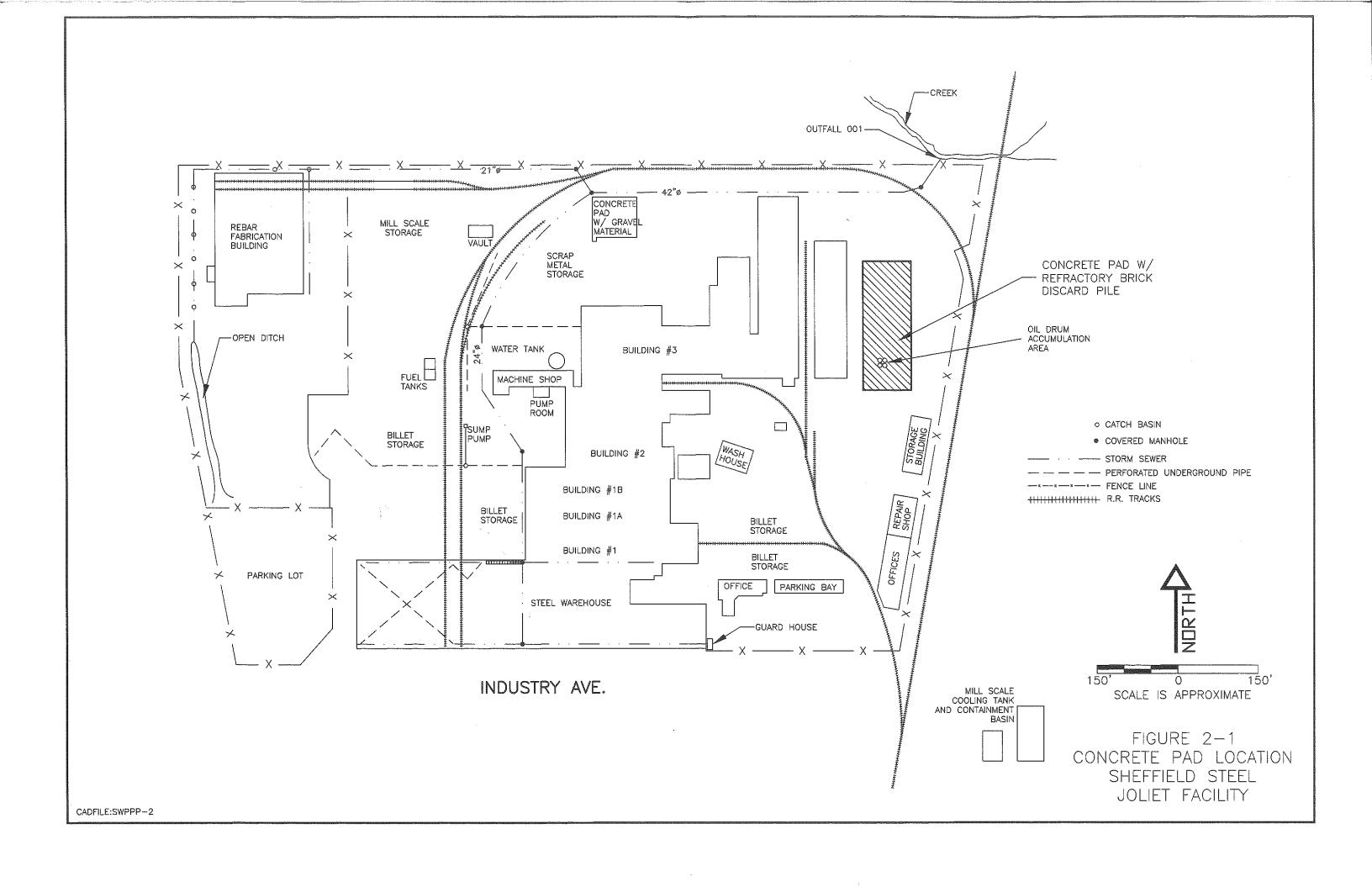
Site Remediation Field Work (cleaning of concrete pad)	March 2000
Data Review and Assessment	rch/April 2000
Preparation and Review of Findings Report	April 2000
Submission of Findings Report to USEPA	May 2000
Submission of Remediation Work Plan to USEPA (if hazardous waste identified).	May 2000

2. CONCRETE PAD

The "oil drum accumulation area" is an accumulation area for drums containing non-hazardous waste grease and oil-contaminated absorbent "pigs." The accumulation area is used for staging these petroleum waste streams before off-site disposal at Land and Lakes non-hazardous landfill. **Figure 2-1** depicts the area.

The entire accumulation area is underlain with a bermed concrete pad to avoid direct exposure of the drums to the ground. Some grease and oil has stained the concrete pad and adjacent ground surface to the east, as observed during USEPA's August 1999 inspection. The staining is the result of minor leaks and spills during routine drum transfer operations. The stained area of the pad measures approximately 45 feet by 20 feet.

Sheffield Steel will steam clean the concrete pad to remove any petroleum residues and then sample the residues to determine whether they are hazardous wastes (see Section 3). [Note: Sheffield Steel also will test the stained soils for hazardous waste characteristics, as outlined in "Site Investigation Work Plan, Petroleum-Stained Soil Areas," which is provided under separate cover.]



3. REMEDIATION APPROACH AND RATIONALE

3.1 Overview of Approach and Rationale

The cleaning will serve to remove petroleum staining from the concrete pad. The cleaning water and any other residues generated during cleaning will be sampled to determine if they should be managed as RCRA hazardous wastes.

3.2 <u>Cleaning Activities</u>

The concrete pad will be scrubbed with Alconox soap, then wet-vacuumed. When cleaning appears complete based upon visual assessment of the pad, the pad will be steam-cleaned, then wet-vacuumed. The water and other residues generated will be captured by the vacuum and drummed. Each volume of water (cleaning and steam rinse) will be drummed separately for waste characterization. The drums will be disposed of off-site as hazardous or non-hazardous wastes, based upon the waste characterization results.

3.3 Contaminants of Potential Interest

The contaminants of potential interest will be limited to those contaminants that would make the cleaning residues RCRA hazardous wastes. Of the four potential hazardous waste characteristics, the only characteristic of interest is toxicity; the cleaning residues would not reasonably be expected to have the characteristics of reactivity, ignitibility, or corrosivity. This expectation is consistent with the generator's knowledge and the characteristics of the wastes routinely generated at the facility.

In order to determine whether the residues exhibit the RCRA toxicity characteristic, organics and metals will be analyzed. The specific constituents analyzed will be those specified in the RCRA lists for TCLP organics and TCLP metals. The TCLP parameters are listed in **Table 3-1**, along with their RCRA regulatory concentrations.

TABLE 3-1
TCLP PARAMETERS

TCLP Organics	RCRA Level, mg/L	TCLP Metals	RCRA Level, mg/L
Benzene	0.5	Arsenic	5.0
Carbon tetrachloride	0.5	Barium	100.0
Chlorobenzene	100.0	Cadmium	1.0
Chloroform	6.0	Chromium	5.0
1,2-Dichloroethane	0.5	Lead	5.0
1,1-Dichloroethylene	0.7	Mercury	0.2
Methyl ethyl ketone	200.0	Selenium	1.0
Tetrachloroethylene	0.7	Silver	5.0
Trichloroethylene	0.5		
Vinyl chloride	0.2		
o-Cresol	200.0 a/		
m-Cresol	200.0 a/		
p-Cresol	$200.0^{~\mathrm{a}/}$		
1,4-Dichlorobenzene	7.5		
2,4-Dinitrotoluene	0.13 ^{b/}		
Hexachlorobenzene	0.13 ^{b/}		
Hexachlorobutadiene	0.5		
Hexachloroethane	3.0		
Nitrobenzene	2.0		
Pentachlorophenol	100.0		
Pyridine	5.0 ^{b/}		
2,4,5-Trichlorophenol	400.0		
2,4,6-Trichlorophenol	2.0		

a/ If o-, m-, and p-cresol concentrations cannot be differentiated, then the total cresol concentration is used. The regulatory level for total cresol is 200 mg/L.

b/ The quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.

4. FIELD PROCEDURES

[Note: Field work safety procedures are described in the site "Health and Safety Plan," which is provided as Appendix A.]

4.1 <u>Cleaning / Steam Rinse</u>

The concrete pad will be scrubbed with brushes and Alconox soap, followed by rinsing using high-pressure steam equipment operated by an environmental contractor.

A wet vacuum will be used to capture all water and other residues. The captured water will be transferred to drums. The drums will be staged on the concrete pad.

4.2 <u>Sample Collection</u>

<u>Sampling Method</u>. Samples will be collected from the washwater and rinsewater drums using disposable bailers. A new bailer will be used for each sample.

<u>Field Screening</u>. Samples will be visually characterized at the time of collection. The characterization will include visual inspection for the presence of a sheen and contaminant-related materials.

4.3 <u>Sampling Handling and Identification</u>

4.3.1 <u>Sample Preservation</u>

<u>Containers</u>. Samples will be placed in containers provided by the laboratory. The containers will meet the minimum quality requirements set forth in USEPA "OSWER Directive No. 9240.0-05A, Specifications and Guidance for Contaminant-Free Sample Containers."

Additives. The sample containers will be pre-preserved with chemical additives, in accordance with USEPA SW-846 guidance. Containers for organic samples will be preserved with hydrochloric acid. Containers for metals will be preserved with nitric acid.

<u>Temperature Control</u>. All samples will be maintained in coolers with ice. Samples will be placed in the coolers as soon as possible after sample collection.

4.3.2 Sample Labels

Samples will be identified by a sticker-label affixed to the container. The information will be recorded in waterproof ink. Information recorded on the label will include:

- Project name
- Sample location identification
- Sample depth
- Date
- Initials of sampler

4.3.3 Sample Packing and Shipping

The following procedures will be used to assure the integrity of sample containers during shipping:

- Careful packing of sample containers in coolers (e.g., use of packing materials).
- Placement of each sample container in an individual plastic baggie to help assure containment, prevention of cross-contamination, and protection of labels.
- Double-bagging of ice to minimize potential for water damage to labels and/or seepage into containers.

4.3.4 Sample Custody

Chain-of-custody will begin as soon as a sample is collected. Once sample labels are placed on sample containers, the containers will be documented on a chain-of-custody form. The laboratory will provide the forms.

4.4 Equipment Decontamination

The heavy equipment used for steam cleaning will itself be steam cleaned for decontamination. Light equipment will be decontaminated as follows:

- 1. Tap water and Alconox wash and scrub.
- 2. Tap water rinse.
- 3. Distilled water rinse.
- 4. Methanol rinse.
- 5. Distilled water rinse.
- 6. Thorough air drying.

Decontamination will be performed on site, in an area located away from the cleaning and sampling activities. The decontamination water will be captured and added to the water drums.

4.5 Documentation

Field documentation will be sufficient to:

- Permit another professional to understand what tasks were performed.
- Identify the procedures, equipment, and materials used in sufficient detail to allow reproducibility of results.
- Identify other evidence, as appropriate, that supports the findings.

Each document will include the following information, at a minimum:

- Project identifier.
- Date and time (as appropriate).

- Location / work area.
- Names of personnel involved.
- Activities performed.
- Equipment used.
- Observations regarding potential contamination.

5. <u>LABORATORY ANALYSIS</u>

5.1 <u>Data Quality Goals</u>

The analytical data quality goals will be as set forth in the Illinois Environmental Protection Agency (IEPA) "Analytical Quality Assurance Plan" (AQAP) for the Bureau of Land Site Remediation Program. "Level IIIB" data quality requirements will be met. (See Section 6 for discussion of quality assurance / quality control procedures.)

5.2 Analytical Methods and Detection Limits

Parameters to be analyzed are organics and metals, per methods USEPA SW-846 guidance. The detection limits will be no greater than the RCRA regulatory levels, as identified in **Table 3-1**.

6. **QUALITY ASSURANCE PROJECT PLAN**

Project quality assurance / quality control (QA/QC) will be as set forth in the Illinois Environmental Protection Agency (IEPA) "Analytical Quality Assurance Plan" (AQAP) for the Bureau of Land Site Remediation Program. "Level IIIB" data quality requirements will be met.

<u>Field QA/QC</u>. Field QA/QC will include the collection and/or designation of field blanks, trip blanks, and matrix spike/matrix spike duplicate (MS/MSD) samples.

- The Alconox soap solution and the steam clean rinse water both will be analyzed for TCLP organics (volatiles only) before use. These two samples will serve as the field blank.
- One trip blank will be included with the sample container shipment. The trip blank will be analyzed for TCLP organics (volatile only).
- One MS/MSD sample will be specified.

No field duplicate will be collected because only a few samples total will be collected.

<u>Laboratory QA/QC</u>. Laboratory QA/QC will be managed by the laboratory. The selected laboratory will be Test America in Bartlett, Illinois. The laboratory will be notified that "Level IIIB" data quality requirements are necessary. QA/QC will include matrix spike/matrix spike duplicate (MS/MSD) samples, which the laboratory will select.

HEALTH and SAFETY PLAN Sheffield Steel Joliet Facility

Prepared by: James E. Huff, P.E. Sarah Monette, P.E.

January 18, 2000



HUFF & HUFF, INC. ENVIRONMENTAL CONSULTANTS LaGRANGE, ILLINOIS

TABLE OF CONTENTS

L	IST OF ACRONYMS	iii
1.	INTRODUCTION	t
2.	SITE DESCRIPTION	2
	2.1 Site Location and Layout	
	2.2 Proposed Work	
3.	PERSONNEL RESPONSIBILITIES	5
	3.1 Personnel Responsibility Overview	
	3.2 Personnel Training	
	3.3 Site Health and Safety Manager	
4.	PHYSICAL AND CHEMICAL HAZARDS	7
	4.1 Physical Hazards	7
	4.2 Chemical Hazards	8
5.	MEDICAL FITNESS / PPE	10
	5.1 Medical Fitness	10
	5.2 Personal Protective Equipment	10
6.	WORK ZONES	12
7.	DECONTAMINATION PROCEDURES	13
	7.1 Personal Protective Equipment Decontamination	13
	7.2 Sampling Equipment Decontamination	
	7.3 Heavy Equipment Decontamination	
8.	EMERGENCY RESPONSE	14
	8.1 Emergency Contacts	14
	8.2 Hospital Location	14
	8.3 Medical Records Access	16
	8.4 Emergency Care	
	8.4.1 First Aid Kit	
	8.4.2 Heat Related Emergencies	
	8.4.3 Chemical Exposure Emergencies	19
	8.5 Decontamination During Medical Emergencies	19
9.	SITE SECURITY	21

TABLE OF CONTENTS (continued)

LIST OF FIGURES

Figure 2-1	Site Location Map	
Figure 2-2	Current Site Layout Map	
Figure 8-1	Hospital Location Map	1
	_	

LIST OF ATTACHMENTS

OSHA Training Certificates Chemical Information Signature Sheet

J:\IDOC\SHEFFIEL\USEPA9900\SiteSafetyPlan,doc

ACRONYMS

BTEX Benzene, Toluene, Ethylbenzene, and Xylenes

CFR Code of Federal Regulations

IDLH Immediate Danger to Life and Health

MSDS Material Safety Data Sheet

OSHA Occupational Safety and Health Administration

PEL Permissible Exposure Limit

PID Photoionization Detector

PAH Polynuclear Aromatic Hydrocarbons

PPE Personal Protective Equipment

ppm parts per million

STEL Short Term Exposure Limit

TCLP Toxicity Characteristic Leaching Procedure

TWA Time Weighted Average

USEPA United States Environmental Protection Agency

VOC Volatile Organic Compound

1. INTRODUCTION

The purpose of this Health and Safety Plan is to define health and safety protocols to be followed during investigation/remediation activities at the Sheffield Steel facility located in Joliet, Illinois.

The work will be performed in areas suspected of containing petroleum residues. The work activities will include removing stained soils, cleaning a concrete pad, and collecting soil and water samples. The work procedures will be as set forth in the two work plans prepared for this site by Huff & Huff, both dated January 2000: "Site Investigation Work Plan, Stained Soil Areas," and "Site Remediation Work Plan, Cleaning of Concrete Pad."

The health and safety protocols established in this plan are based upon the site conditions and chemical hazards known to be present and/or anticipated to be present from the available site data. This plan is intended solely for use during the proposed activities. Specifications herein are subject to review and revisions based upon actual conditions encountered in the field. Before site activities begin, all personnel involved in these activities will have read and understood this plan and all revisions made thereto.

The information presented in this Health and Safety Plan includes:

- The site description
- Personnel responsibilities
- Potential physical and chemical hazards
- Medical surveillance
- Work zones
- Decontamination procedures
- Emergency response
- Site security

2. SITE DESCRIPTION

2.1 Site Location and Layout

The site address is:

Sheffield Steel Industry Avenue Joliet, Illinois

Figure 2-1 depicts the site location and Figure 2-2 depicts the site layout, including proposed work areas. The site is located in an area of industrial properties.

2.2 Proposed Work

Surface staining has been identified in three soil areas and on a concrete pad. The soils will be removed from the ground and placed into drums, and the concrete pad will be scrubbed and steam-cleaned, with the cleaning waters wet-vacuumed into drums. Samples will be taken from the soil and water drums. The samples will be analyzed for hazardous waste characteristics: TCLP organics and TCLP metals.

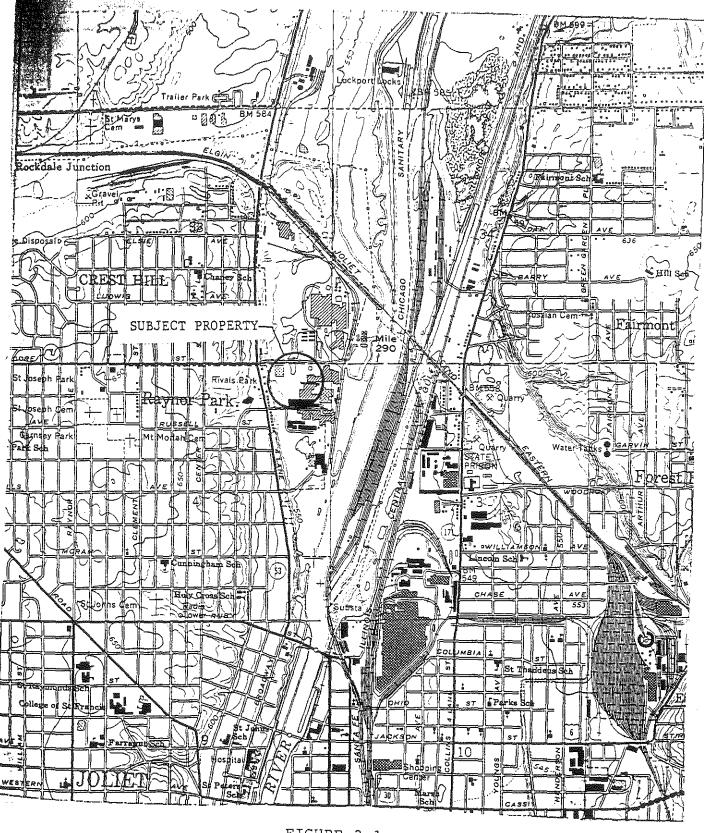


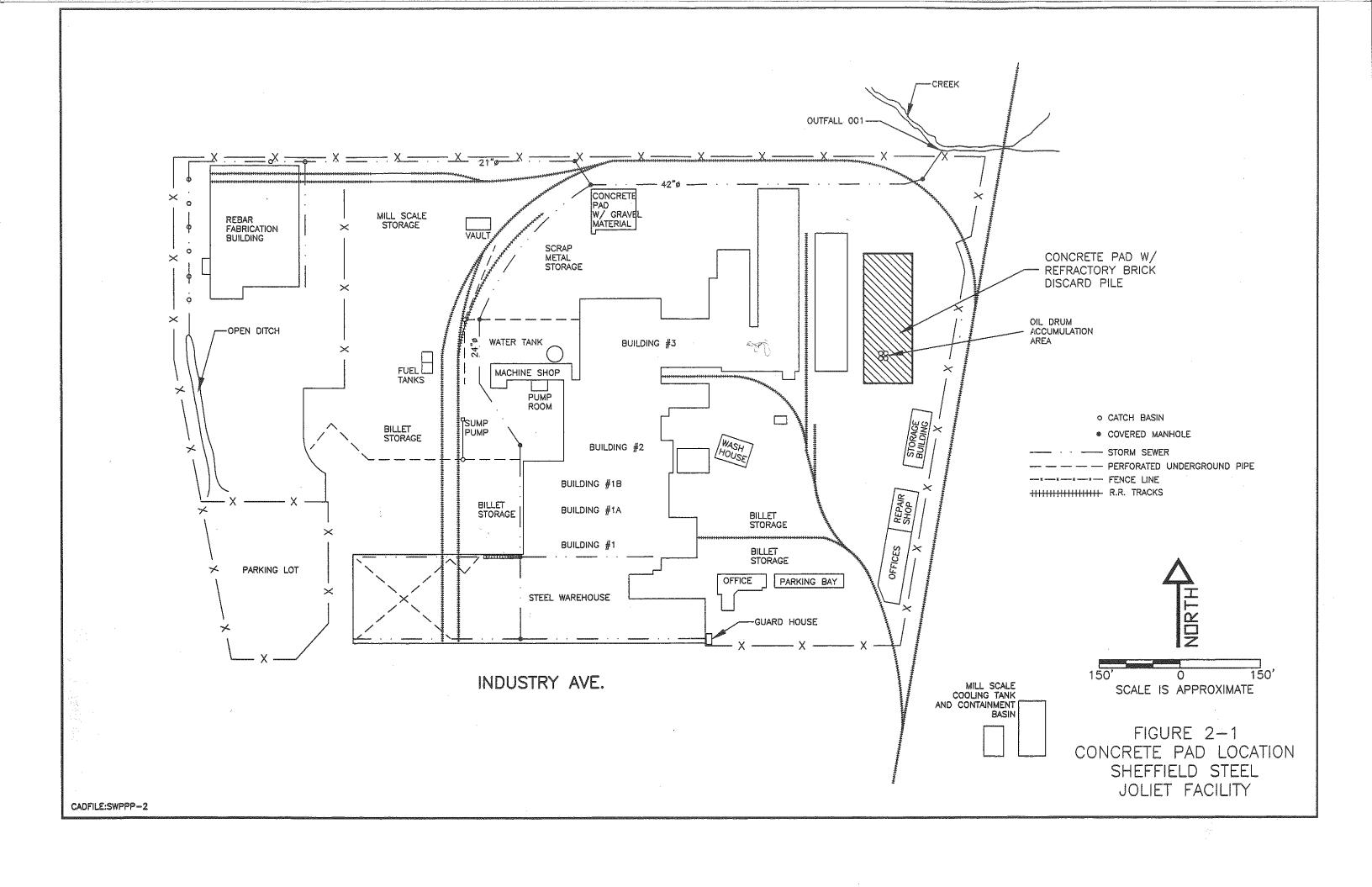
FIGURE 2-1

SITE LOCATION MAP SHEFFIELD STEEL

NORTH

SCALE: 1'' = 2000'

SOURCE: UNITED STATES DEPARTMENT OF THE INTERIOR, GEOLOGICAL SURVEY JOLIET QU'DRANGLE



SITE REMEDIATION WORK PLAN CLEANING OF CONCRETE PAD SHEFFIELD STEEL CORP. JOLIET FACILITY USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp. Joliet, Illinois

prepared by:

Huff & Huff, Inc. James E. Huff, P.E. Sarah Monette, P.E.

SITE INVESTIGATION WORK PLAN STAINED SOIL AREAS SHEFFIELD STEEL CORP. JOLIET FACILITY USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp. Joliet, Illinois

prepared by:

Huff & Huff, Inc. James E. Huff, P.E. Sarah Monette, P.E.

SITE INVESTIGATION WORK PLAN STAINED SOIL AREAS SHEFFIELD STEEL CORP. JOLIET FACILITY USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp. Joliet, Illinois

prepared by:

Huff & Huff, Inc. James E. Huff, P.E. Sarah Monette, P.E.

2.1 Oil Drum Accumulation Area

The "oil drum accumulation area" is an accumulation area for drums containing non-hazardous waste grease and oil-contaminated absorbent "pigs." The accumulation area is used for staging the drums before off-site disposal at Land and Lakes non-hazardous landfill. Figure 2-1 depicts the area.

The entire accumulation area is underlain with a bermed concrete pad to avoid direct exposure of the drums to the ground. Some grease and oil has stained the concrete pad and the adjacent ground surface to the east, as observed during USEPA's August 1999 inspection. The staining is the result of minor leaks and spills during routine drum transfer operations. Approximately 60 square feet of soil are affected; the staining appears to be limited to the ground surface.

Sheffield Steel will excavate the stained soils and place them into drums. Prior to excavation, the stained soils will be sampled to determine whether they are RCRA hazardous wastes (see Section 3). [Note: Sheffield Steel also will steam clean the concrete pad, as outlined in "Site Remediation Work Plan, Cleaning of Concrete Pad," which is provided under separate cover.]

In addition, Sheffield Steel will confirm removal of all stained soils by screening the underlying soils for the presence of petroleum residuals. The screening will include visual assessment, olfactory assessment, and screening with a photo-ionization detector (PID).

The PID will be used to screen the samples for the presence of VOCs using a closed-cup protocol. A sample of the underlying soil will be placed in a one-pint plastic cup, approximately half-full. A lid will be placed on the cup and the cup will be set aside for approximately 15 minutes in a warmed area to allow the concentration of volatiles in the headspace to come into equilibrium with the concentration of volatiles in the soil. The lid will be slit with a razor knife and the PID probe will be inserted into the headspace. PID responses will be provided in parts per million (ppm) readings. The PID meter has a detection range from 1 ppm to 2,000 ppm, and is calibrated to read in equivalent ppm of benzene. This headspace method allows detection of

volatiles at relatively low detection levels, and the method is reproducible.

Excavation of the soils will continue until these screening procedures confirm that all impacted soils have been removed. Upon completion, the excavation will be backfilled with clean gravel.

2.2 Oil Room / Gear Box

An out-of-use gear box is located on the ground outside of the "oil room." Oils remaining in the gear box overflowed during storm events in 1999. The overflows stained the ground surface, as observed during USEPA's August 1999 inspection. Approximately 45 square feet of soil are affected; the staining appears to be limited to the ground surface. Figure 2-1 depicts the area of staining.

Sheffield Steel will excavate the stained soils and place them into drums. Prior to excavation, the stained soils will be sampled to determine whether they are RCRA hazardous wastes (see Section 3).

In addition, Sheffield Steel will confirm removal of all stained soils by screening the underlying soils for the presence of petroleum residuals. The screening will include visual assessment, olfactory assessment, and screening with a photo-ionization detector (PID), as described in Section 2.1.

Excavation of the soils will continue until these screening procedures confirm that all impacted soils have been removed. Upon completion, the excavation will be backfilled with clean gravel.

2.3 Mill Scale Cooling Tank

The "mill scale cooling tank" is used as a settling tank to remove mill scale and oil from waters used at the facility. The mill scale settles to the bottom the tank, then is scooped out, collected into drums, and disposed of off-site. The oils are skimmed from the top of the tank, collected into drums, and disposed of off-site. Figure 2-1 depicts the mill scale tank area.

The adjacent ground surface directly to the south of the tank is stained with a material that appears to be oil, as observed during USEPA's August 1999 inspection. Approximately 100 square feet of soil are affected; the staining appears to be limited to the ground surface.

Sheffield Steel will excavate the stained soils and place them into drums. Prior to excavation, the stained soils will be sampled to determine whether they are RCRA hazardous wastes (see Section 3).

In addition, Sheffield Steel will confirm removal of all stained soils by screening the underlying soils for the presence of petroleum residuals. The screening will include visual assessment, olfactory assessment, and screening with a photo-ionization detector (PID), as described in Section 2.1.

Excavation of the soils will continue until these screening procedures confirm that all impacted soils have been removed. Upon completion, the excavation will be backfilled with clean gravel.

SITE REMEDIATION WORK PLAN CLEANING OF CONCRETE PAD SHEFFIELD STEEL CORP. JOLIET FACILITY USEPA ID No.: ILD 151 759 248

prepared for:

Sheffield Steel Corp. Joliet, Illinois

prepared by:

Huff & Huff, Inc. James E. Huff, P.E. Sarah Monette, P.E.

3.2 <u>Cleaning Activities</u>

The concrete pad will be scrubbed with Alconox soap, then wet-vacuumed. When cleaning appears complete based upon visual assessment of the pad, the pad will be steam-cleaned, then wet-vacuumed. The water and other residues generated will be captured by the vacuum and drummed. Before work begins, absorbent pigs will be placed around the edges of the pad to absorb waters not captured by the vacuum. The pigs also will be drummed when cleaning is complete.

Each volume of water (cleaning and steam rinse) will be drummed separately for waste characterization. The drums will be disposed of off-site as hazardous or non-hazardous wastes, based upon the waste characterization results.

3.3 Soil Sample Locations

Soil samples will be collected from three areas:

- The oil drum accumulation area.
- The oil room / gear box area.
- The mill scale cooling tank area.

For each area, two samples will be collected for analysis: one composite sample and one grab sample.

Composite samples will be collected for analysis of metals and semi-volatile organics. The use of composite samples will help assure representative sampling of the stained areas. Each stained area will be divided into four quadrants. A sample of the stained soils will be collected from the center of each quadrant. The four quadrant samples will then be composited into one sample, which will be analyzed for TCLP metals and TCLP semi-volatile organics.

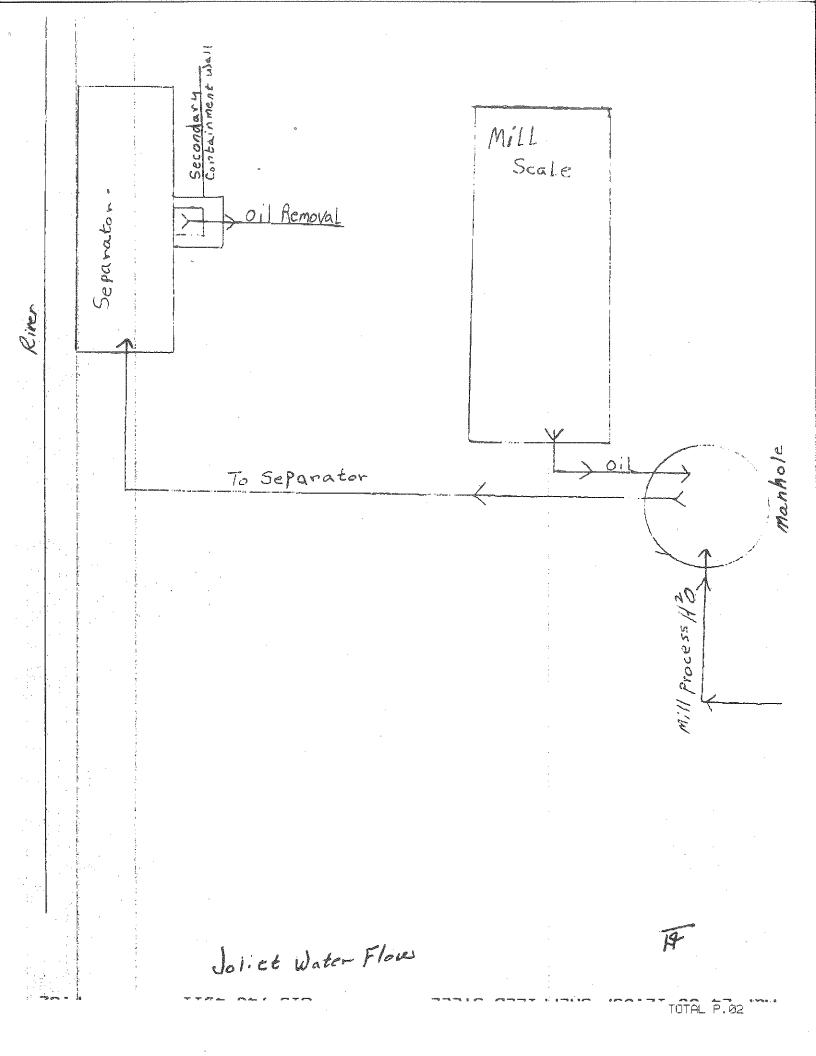
Composite samples cannot be collected for analysis of volatile organics because the handling could release the volatile constituents. Instead, grab samples will be collected. For each stained area, soil will be collected from the center of each quadrant and field-screened with the PID (as described in Section 2.1). A grab sample then will be collected from the quadrant with the highest PID reading and will be analyzed for TCLP volatile organics.

4.1 <u>Sample Collection</u>

<u>Sampling Method</u>. Soil samples will be collected using a trowel. <u>The samples will be collected</u> from the depth of soil staining, which is expected to be greatest within one foot of the surface.

Composite samples and grab samples will be collected (see Section 3.3). For the composite samples, each of the four quadrant samples will be placed into a stainless steel bowl and mixed with the trowel, then the mixed sample will be placed into the sample container. The mixing will help to assure a homogeneous composite sample. Grab samples will be placed directly into the sample container.

<u>Field Screening</u>. Samples will be visually characterized at the time of collection. The characterization will include visual inspection for soil type and color, water content, and contaminant-related materials. <u>Grab samples collected for volatile organic analysis also will be field screened with a PID (see Section 3.3).</u>



3. PERSONNEL RESPONSIBILITIES

3.1 Personnel Responsibility Overview

All on-site personnel shall be trained in health and safety issues and will responsible for adhering to the procedures in this Health and Safety Plan. The Huff & Huff Site Health and Safety Manager will have ultimate responsibility for the procedures. Should the Site Health and Safety Manager become incapacitated or absent in any way, the contractor shall be in charge, and shall stop work until the Site Health and Safety Manager is available.

3.2 Personnel Training

All operational personnel shall have participated in routine health and safety education and training programs. These training programs shall have been designed to comply with USEPA and OSHA 29 CFR 1910.120(e) requirements: 40 hours of initial instruction, 8 hours of refresher training, and an additional 8 hours of specialized training for supervisors. At a minimum, the training shall have included the following:

- General Safety Rules
- First Aid/CPR
- Emergency Response Procedures
- Fire Prevention/Protection
- Electrical Hazards
- Basics of Chemistry
- Basics of Toxicology/Physiology
- Hazardous Materials (Types/Characteristics)
- Hazard Communication Information
- Respiratory Protection
- Respirator Training
- Chemical Protective Clothing
- Decontamination Procedures/Personal Hygiene
- Confined Space Work/Safety
- Atmospheric Testing/Sampling Procedures
- Federal and State Regulations

Current training certificates for Huff & Huff personnel are included in the attachments to this plan.

3.3 Site Health and Safety Manager

The Huff & Huff Site Health and Safety Manager will be responsible for the health and safety of personnel on-site, including the contractors. The Manager's specific responsibilities will be:

- 1. To require that all personnel entering the site read this Health and Safety Plan and acknowledge in writing that they understand the contents of the plan. The sign-off form is provided in the attachments.
- 2. To assure that the Health and Safety Plan is adhered with.
- 3. To decide when to change levels of personal protective equipment, and, if necessary, to shut down operations.

Failure to follow guidelines of the Site Health and Safety Manager can be cause for suspension of a worker from the site.

4. PHYSICAL AND CHEMICAL HAZARDS

4.1 Physical Hazards

The <u>potential</u> physical hazards for this site include heavy objects/moving machinery and fire/explosion.

heavy objects / moving machinery

Site activities will include operations involving steam-cleaning equipment and wet-vacuuming equipment.

fire / explosion

The fuels used for the cleaning equipment might present the potential for fire/explosion when exposed to a heat source and source of ignition.

Note: Potential physical hazards are anticipated from cleaning activities only, not from soil removal and sampling activities. The soil staining appears to be limited to the ground surface (top one foot). Therefore, no heavy equipment will be used to transfer the soils into drums, and no underground utilities will be encountered. The soil and water samples will be collected from the drums manually, using trowels and disposable bailers.

The following steps will be taken to avoid potential injury associated with the physical hazards:

- 1. Modified Level D PPE (Level C minus respirator: steel toes boots, hard hat, latex gloves, and safety glasses) will be worn for all field activities. (Respirators might also be required under certain conditions; see Section 4.2.) No one except the cleaning crew should be within 25 feet of the cleaning machinery while it is in operation. Due caution should be exercised by all personnel on site.
- 2. During operations, personnel shall act as safety backup to each other and shall provide emergency assistance.
- 3. Personnel will review standard communications for operating and emergency conditions.
- 4. NO SMOKING will be permitted anywhere within 25 feet of sampling activities.
- 5. All electrical equipment (power tools, extension cords, instruments, radios, etc.) shall be in conformance with OSHA 29 CFR 1926.400 Subpart K.

4.2 Chemical Hazards

The <u>potential</u> chemical hazards at the site are related to exposure to the chemical contaminants in the soil and water. The primary contaminants anticipated to be present at the site are petroleum constituents: BTEX and PAHs. Potential routes of exposure are dermal adsorption, ingestion, and inhalation.

The following steps will be taken to avoid potential injury associated with chemical hazards:

- 1. Modified Level D PPE (Level C minus respirator: steel toed boots, hard hat, gloves, and safety glasses) will be worn for all field activities. Upgrade to Level C (respirator) might be required based upon site atmospheric conditions (see Item 8 below).
- 2. Work areas for various operational activities will be established. Entrance and exit locations will be designated and emergency escape routes delineated. (Work zones are discussed in Section 6.)
- 3. Personnel should wash their hands and face before leaving the site.
- 4. Eating, drinking, chewing gum or tobacco, smoking, or any other practice that increases the probability of hand-to-mouth transfer and ingestion of material is prohibited in any work area.
- 5. Medicine and alcohol can increase the effects from exposure to toxic chemicals. Prescribed drugs should not be taken by personnel where the potential for adsorption, inhalation, or ingestion of toxic substances exists, unless specifically approved by a qualified physician. Alcoholic beverage intake must be avoided.
- 6. Contact with contaminated or suspected contaminated surfaces should be avoided. Personnel should avoid walking through puddles, leachate, and discolored surfaces whenever possible. Personnel should not kneel on the ground, lean, sit, or place equipment on drums, containers, or contaminated areas of the ground.
- 7. Contact lenses should not be worn when the hazard of a splash exists.
- 8. Site atmospheric conditions will be monitored during any subsurface activities. Benzene concentrations and dust will be used as indicator parameters for determining the level of respiratory/ingestion protection. These parameters will be monitored in two ways: (a) PID meter and (b) visual observation.
 - 8a. <u>PID Meter</u>. On a toxicological basis, benzene is the petroleum constituent of greatest concern. The MSDS for benzene is included in the attachments to this plan. The TWA is 1 ppm (15 min) and the STEL is 5 ppm (15 min). A 10.2 eV PID or a 10.6 eV PID

will be calibrated to read the VOC concentration in a sample or in the atmosphere as benzene. If the average PIDs level is greater than 1 ppm above background in the breathing zone, then the level of respiratory protection will be upgraded from Level D (none) to Level C (air-purifying respirators with combination dust/organic vapor removal cartridges). PIDs will be used a minimum of once at every location to monitor the breathing zone.

8b. <u>Visual Observation</u>. If airborne dust is observed, then the level of respiratory/ingestion protection will be upgraded from Level D (none) to Level C (air purifying respirators with combination dust/organic vapor removal cartridges.)

In the case that upgrade to Level C PPE is required, all personnel shall have air-purifying respirators available with combination dust/organic vapor cartridges. The following protocol apply to the use of respirators:

- Respirators shall be clean and disinfected after each day's use, or more often if necessary.
- Before donning, respirators will be inspected for worn or deteriorated parts.
- Personnel must use the buddy system when wearing respiratory protection equipment.
- No facial hair, which interferes with a satisfactory fit of the mask-to-face-seal, is allowed.
- Contact lenses shall not be worn when respirator protection is required.

5. MEDICAL FITNESS / PPE

5.1 Medical Fitness

Huff & Huff personnel participate in a medical program that includes a physical examination once every two years. The program adheres to the requirements of 29 CFR 1910.120(f). The physical examination includes blood, urinalysis, cardio-pulmonary, hearing, and vision tests, as well as a respiratory examination to determine physical fitness to wear respiratory equipment. Personnel are mailed a copy of the record following the examination and have been made aware that the medical records are accessible.

Contractors' medical programs must be similar to Huff's medical program.

5.2 Personal Protective Equipment

PPE is a very important consideration in any site investigation that involves or may involve hazardous working conditions. As stated in Section 4.2, given the preliminary information concerning the site, modified Level D protection (Level C minus respirator) will be implemented. Respirators with combination dust/organic vapor cartridges will be required whenever the average breathing zone PID reading is 1 ppm or more above background levels.

The Site Health and Safety Manager will decide on appropriate PPE to be worn and he/she will have the discretionary power to upgrade personal protection as appropriate. For example, under muddy conditions, the Site Health and Safety Manager may require disposable boot covers and Tyvek coveralls to be worn. Failure to wear PPE required by the Site Health and Safety Manager can be cause for suspension of a worker from the site.

The following PPE will be available to all on-site personnel:

- hard hat
- safety boots (steel toe)
- gloves (inner and outer)
- clean work clothes (company issued and cleaned)
- full-face or partial-face respirators with combination dust/organic vapor cartridges
- disposable boot covers
- protective (Tyvek) coveralls

6. WORK ZONES

The Site Health and Safety Manager will establish work zones in the event that levels monitored during the work procedures exceed the breathing zone action levels as defined in Section 4.2. The work zones will include an "exclusion zone" in the area where the hazard is present, a "transition zone" where decontamination will take place, and a "support zone" which will be in an area free of hazard. Only protected personnel will be allowed in the hot zone and transition zone; all other personnel will remain in the support zone.

7. DECONTAMINATION PROCEDURES

(Note: Special decontamination procedures to be implemented during medical emergencies are discussed in Section 8, Emergency Response.)

7.1 Personal Protective Equipment Decontamination

Decontamination of PPE will be performed on site in an area designated as a "transition zone." Decontamination will be performed in the following steps:

- 1. Remove boots and clean, removing any soil or debris.
- 2. Remove hard hat and clean, removing soil and debris.
- 3. Remove outer gloves, garments, and tape and place in plastic garbage bag for proper disposal.
- 4. Remove work clothes and send to commercial/industrial laundry service.
- 5. Remove inner gloves and place in plastic garbage bag for proper disposal.
- 6. Remove respirator cartridges and place in plastic garbage bag for proper disposal.
- 7. Remove respirator and place in bag for proper cleaning and storing.
- 8. The face and hands should be washed thoroughly as soon as possible after the PPE is removed.

7.2 Sampling Equipment Decontamination

Decontamination of sampling equipment will be performed on site in an area designated as a "transition zone." Decontamination will be performed in the following steps:

- 1. Tap water and Alconox wash and scrub.
- 2. Tap water rinse.
- 3. Distilled water rinse.
- 4. Methanol rinse.
- 5. Distilled water rinse.
- 6. Thorough air drying.

7.3 Heavy Equipment Decontamination

The only heavy equipment used on site will be the steam-cleaning/wet-vacuuming equipment. Based upon its use as cleaning equipment, its decontamination will be performed as part of the cleaning process.

8. EMERGENCY RESPONSE

8.1 Emergency Contacts

The following phone numbers may be of assistance during a site emergency.

Ambulance	911
Joliet Fire Department	911
Joliet Police Department	911
St. Joseph Medical Center	911
Huff & Huff, Inc.	(708) 579-5940

8.2 <u>Hospital Location</u>

In the event it becomes necessary to transport a victim to the hospital, a map with directions to the St. Joseph Medical Center is provided as Figure 8-1.

The directions to the hospital are as follows:

Exit the property onto Industry Ave. heading right (west).

Turn right (north) onto Route 53 (Broadway St.).

Follow Route 53 (Broadway St.) to Route 7 (Theodore St.).

Turn left (west) onto Route 7 (Theodore St.).

Follow Route 7 to where it turns south (Larkin Ave.).

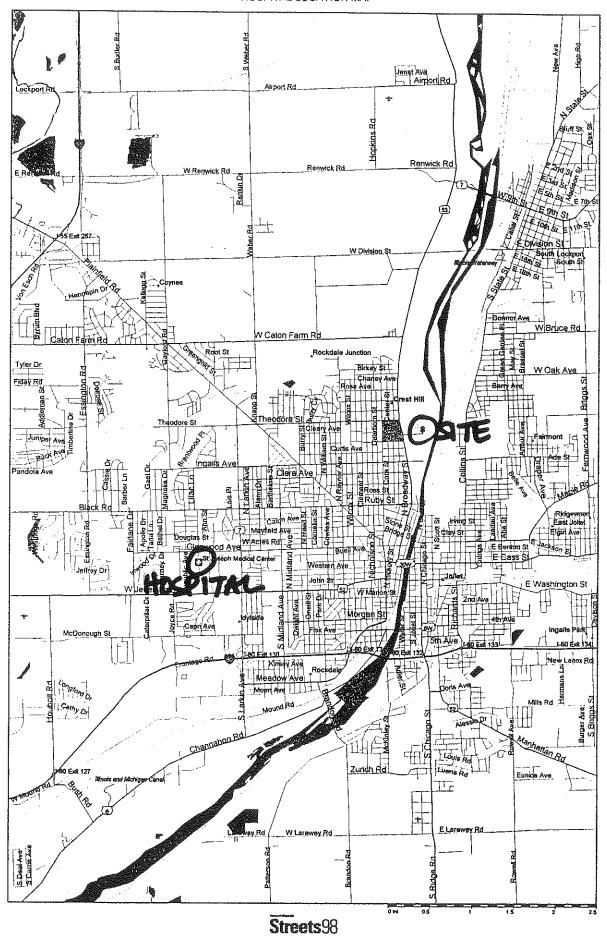
Turn left (south) onto Route 7 (Larkin Ave.).

Follow Route 7 (Larkin Ave.) to Glenwood Ave.

Turn right (west) onto Glenwood Ave.

The St. Joseph Medical Center is located on south (left) side of Glenwood Ave.

FIGURE 8-1 HOSPITAL LOCATION MAP



8.3 Medical Records Access

Personal medical records for Huff & Huff personnel may be obtained from:

Occupational Health Services Executive Clinic 222 East Ogden Avenue Hinsdale, IL 60521

Phone: (630) 887-6133

Emergency Phone: (630) 887-6133

8.4 Emergency Care

At least one first aid kit will be available on-site for minor medical care. For major medical care, emergency medical care procedures must be implemented. Heat related emergencies and chemical exposure emergencies are two of the more common major medical problems encountered during environmental investigation activities. The requirements of the first aid kit and the symptoms of the heat and chemical related emergencies are provided below, along with emergency care procedures. The procedures discussed are only guidelines: actual training in emergency medical care or basic first aid is recommended.

8.4.1 First Aid Kit

First aid kits that meet the requirements of 29 CFR 1926.50 will be accessible to all personnel associated with this project. The first aid kits will consist of waterproof containers with individual sealed packages for each care item. The contents will be checked before being brought to the job site.

8.4.2 <u>Heat Related Emergencies</u>

Heat exposure becomes dangerous when the body can no longer regulate its core temperature. Heat related illnesses include heat rash, heat cramps, heat exhaustion, and heat stroke. These illnesses may occur in sequence, beginning with heat rash and progressing into a more severe illness, such

as heat stroke. Alternatively, heat stroke may occur with no precursor. It is important always to remember that <u>heat stroke can cause irreversible damage or death if not treated promptly.</u>

Heat Rash affects the skin and feels like prickly heat.

Signs and Symptoms:

- 1. Skin Rash
- 2. Tingling or prickling sensation on the skin.

Emergency Care:

- 1. Shower
- 2. Dry Skin Thoroughly
- 3. Change undergarments as needed
- 4. Stay in a cool place
- 5. Avoid repeated heat exposure.

Heat Cramps are muscle pains, usually in lower extremities, the abdomen, or both.

Signs and Symptoms:

- 1. Cramps in lower extremities or abdomen. The cramps occur suddenly and commonly are incapacitating and cause intense pain, though some cramps can be mild.
- 2. Increased respiratory rate.
- 3. Increased pulse rate.
- 4. Pale and moist skin.
- 5. Normal body temperature.
- 6. Loss of consciousness.
- 7. Generalized weakness.

Emergency Care:

- 1. Remove outer, protective garments to allow the victim to cool down. Move the victim to a cool environment; lay victim down if feels faint.
- 2a. <u>If the person is not nauseated</u>, give 1 or 2 glasses of water or an electrolyte solution. Have the person drink slowly. The use of salt tablets is not recommended, as they may precipitate nausea.
- 2b. If the person is nauseated, avoid giving anything by mouth until the nausea subsides.
- 3. Avoid massaging the cramping muscles. This rarely helps and may actually aggravate the pain.
- 4. Sponge the person with cool water. If you fan the person, avoid chilling: when the body chills, the muscles generate energy; when the body shivers, this energy is released in the form of heat and actually can increase the body temperature.
- 5. As salt and water levels are replenished, the pain will subside. A return to work is NOT recommended for a period of at least 12 hours. Further exertion may lead to heat exhaustion or heat stroke.

Heat Exhaustion is a more severe response to loss of salt and water.

Signs and Symptoms:

- 1. Heat exhaustion may come on suddenly and cause collapse, or may be present with a headache, fatigue, dizziness, and nausea with occasional abdominal cramping.
- 2. Profuse sweating.
- 3. Rapid and weak pulse rate.
- 4. Rapid and shallow respiration rate.
- 5. Pale and clammy skin.
- 6. Normal or decreased body temperature.
- 7. Irritability and restlessness.

Emergency Care:

- 1. Move the person to a cool environment, take off as much clothing as possible, place in a supine position with legs elevated.
- 2. Sponge the person with cool water. If you fan the person, avoid chilling: when the body chills, the muscles generate energy; when the body shivers, this energy is released in the form of heat and actually can increase the body temperature.
- 3. Monitor the person's level of consciousness and airway.
- 4. If the victim does not feel better, at this point, consider this a medical emergency and seek prompt intervention by emergency medical services.

Heat Stroke is caused by a severe disturbance in the body's heat-regulating mechanism and is a profound emergency, with a mortality rate ranging from 25 to 50 percent. It is most common in men over 40, especially in alcoholics. It can also occur in people of any age having too much exposure to the sun or prolonged confinement in a hot atmosphere. Heat stroke comes on suddenly. As the sweating mechanism fails, the body temperature begins to rise precipitously, reaching 106°F (41°C) or higher within 10 to 15 minutes. If the situation is not corrected rapidly, the body cells, especially the cells of the brain, are literally cooked, and irreversible central nervous system damage occurs.

Signs and Symptoms:

- 1. Strong and bounding pulse rate.
- 2. Hot, dry and flushed skin.
- 3. Potential headache, dizziness, and dryness of mouth.
- 4. Seizures and coma.
- 5. Potential loss of consciousness and airway maintenance problems.

Emergency Care:

- 1. Speed is essential: delay may result in permanent brain damage.
- 2. Establish an open airway.
- 3. Move the person to a cool environment. Take off as much clothing as possible, place in a semi-reclining position with the head elevated.
- 4. Use any means possible to cool the person. Improvise with whatever is available, such as a tub filled with cold water and ice cubes. Vigorous efforts to cool the worker must continue until the body is below 102°F (38.9°C).
- 5. If the victim is conscious, give water or electrolyte solution. Have the person drink slowly.

6. This is a medical emergency. Seek prompt intervention by emergency medical services.

8.4.3 <u>Chemical Exposure Emergencies</u>

Chemical exposure symptoms vary depending upon the chemical of concern. Based the anticipated hazards at this site, the primary chemical of concern will be benzene. The MSDS for benzene is provided in the attachments.

In the event of chemical exposure, the following general measures should be taken:

- 1. Contact the Site Health and Safety Manager immediately.
- 2. For inhaled contaminants, seek immediate medical attention.
- 3. For contamination of the skin and eyes, use water to flush the affected area.
- 4. Wash splashes off protective clothing as rapidly as possible and remove the clothing carefully.

8.5 <u>Decontamination During Medical Emergencies</u>

Decontamination procedures for injured personnel are an important medical consideration. Improper decontamination may aggravate or cause more serious health effects. In the event of minor physical problems or injuries, e.g., sprained ankle, cuts, etc., normal decontamination procedures should be followed. However, in the event that a life-threatening situation occurs, decontamination procedures will be omitted and prompt life-saving first aid and medical attention will be administered.

Special decontamination procedures to be followed during the response to a life-threatening physical injury include:

- 1. Contact the Site Health and Safety Manager immediately.
- 2. Remove outer garments (depending on the weather) if they do not cause delays, interfere with treatment, or aggravate the problem. Full-encapsulating and chemical resistant suits can be cut away.

- 3. If the outer contaminated garments cannot safely be removed, wrap the individual in plastic, rubber, or blankets to help prevent contaminating the inside of ambulances and medical personnel.
- 4. No attempt should be made to wash or rinse the victim at the site. The one exception to this is if it is known that the individual has been contaminated with an extremely toxic or corrosive material which could also cause severe injury or loss of life.

9. SITE SECURITY

Personnel entering the work area shall be required to read this Health and Safety Plan and familiarize themselves with the site conditions. Unauthorized personnel will not be allowed access to the work area. At the end of the work day, the Site Health and Safety Manager is to ensure the work area has been secured, including the backfilling of all boreholes.

ATTACHMENTS



BENZENE

			Security Charles and Charles a			
Common Synon Benzol Benzole		Colorless Gesoline-like ador Flammable, imitating vapor is produced. Freezing 42°F.	6. FIRE HAZARDS 6.1 Flash Point: 12°F C.C. 6.2 Flammeble Limits in Air; 1.3%-7.9% 6.3 Fire Extinguishing Agents: Dry chemical, foam, or carbon dioxide	10. HAZARD ASSESSMENT CODE (See Hazard Assessment Handbook) A-T-U-V-W		
Avord contact with liquid and vapor. Keep propile away, Wear googles and self-contained breathing apparatus. Shut off ignition sources and celf-fire department, Stop discharge if possible Stay upwind and use water spray to "knock down" vapor. Isoletia and remove descharged material. Notity local health and poliution control agencies.			6.4 Fire Extinguishing Agents Not to be Used: Water may be inelfective 6.5 Special Hazards of Combustion Products: Not pertinent 6.8 Sehavior in Fire: Vapor is heavier than air and may itsivel considerable distance to a source of ignition and fleak back 6.7 Ignition Temperature: 1097-F	11. HAZARO CLASSIFICATIONS 11.1 Code of Federal Regulations: Flammable liquid 11.2 NAS Nazard Rating for Bulk Water Transportation: Category Rating		
Fire	FILAMMABLE. Flashback along vapor trail Vapor may explode it ignite Wear goggles and self-cont Estinguish with dry chemica Water may be ineffective or Cool exposed containers with	d in an enclosed area, ained breathing apparatus. I, foam, or carbon dioxide. I fire.	6.8 Electrical Hazard: Class I, Group 0 6.9 Burning Rate: 6.0 mm/mn. 6.10 Adiabatic Flame Temperature: Oats not available 6.11 Stoichlometric Air to Fuel Retio: Oats not available 6.12 Flame Temperature: Oats not available	Fire		
Exposure	Move to Iresh air. It breathing has stopped, gi If breathing is difficult, give LIQUID Initiating to skin and eyes. Harmful if swellowed. Remove contaminated clott Flush affected areas with pi File PESS, hold eyelds.	che, difficult breathing, or loss of consciousness. ve artificial respiration. oxygen. ing and shoes.	7. CHEMICAL REACTIVITY 7.1 Reactivity With Water: No reaction 7.2 Reactivity with Common Materials: No reaction 7.3 Stability During Transport: Stable 7.4 Neutralizing Agents for Acids and Caustics: Not pertinent 7.5 Polymerization: Not pertinent 7.6 Inhibitor of Polymerization: Not pertinent 7.7 Molar Ratio (Reactant to Product): Data not available 7.8 Reactivity Group: 32	Aesthetic Effect		
Water Pollution	HARMFUL TO AQUATIC LI May be dangerous if it ente Notify local health and wildl Notify operators of nearby v	ife officials.		12. PHYSICAL AND CHEMICAL PROPERTIES 12.1 Physical State at 15°C and 1 atm: Liquid 12.2 Molecular Weight 78.11 12.3 Boiling Point at 1 atm: 176°F = 80.1°C = 353.3°K		
(See Response	NSE TO DISCHARGE Methods Handbook) 9-high flammability ss	2 LABEL 2.1 Category: Flammable liquid 2.2 Class: 3	8. WATER POLLUTION 8.1 Aquatic Toxicity: 5 ppm/6 hr/minnow/lethal/distilled water 20 ppm/24 hr/sunfish/TL _m /tap water 8.2 Waterfowl Toxicity: Data not available 8.3 Biological Oxygen Demznd (BOD): 1.2 lb/lb, 10 days	12.4 Freezing Point 42.0 °F = 5.5 °C ≈ 278.7 °K 12.5 Critical Temperature: 552.0 °F ≈ 288.9 °C ≈ 562.1 °K 12.6 Critical Pressure: 710 psia ≈ 48.3 atm ≈ '4.89 MN/m² 12.7 Specific Gravity: 0.879 at 20 °C (liquid) 12.6 Liquid Surface Temsion: 28.9 dynes/cm = 0.0289 N/m at 20 °C		
3.1 CG Compatibility Hydrocarbon 3.2 Formula: CeHe 3.3 IMO/UN Design 3.4 DOT ID No.: 111	Formula: CeHe 4.3 Odor: Aromatic; rather pleasant aromatic infO/UN Designation: 3.2/1114 odor; characteristic odor		8.4 Food Chain Concentration Potential: None	12.9 Liquid Water Interfacial Tension: 35.0 dynos/cm = 0.035 N/m at 20°C 12.10 Vapor (Gas) Specific Gravity: 2.7 12.11 Ratio of Specific Heats of Vapor (Gas): 1.051 12.12 Laternt Heat of Vaporization: 169 Btu/lb = 94.1 cai/g = 3.94 X 10³ J/kg 12.13 Heat of Combustion: —17,460 Btu/lb		
hydrocarbon- hydrocarbon- hydrocarbon- 5.2 Symptome Fol headache, br 5.3 Treatment of I contaminates iNHALATION stopped, star 5.4 Threshold Lim 5.5 Short Term int 5.6 Taxicity by Int 5.7 Late Toxicity: 5.8 Vepor (Gae) in of eyes or re 5.9 Liquid or Solte remain, may	active Equipment: Hydrocarbinosuble rubber or plastic glo- insoluble apron such as neop- insoluble apron such as neop- insoluble apron such as neop- iceathleasness, chest constricts Exposure: SKIN: flush with we di clothing and wesh akin. EYE it: remove from exposure imme it resuscitation, administer oxy its Velue: 10 ppm halation Limite: 75 ppm for 31 gestion: Grade 31; LD so = 50 Louisemia ritiant Cheracteristica: If pres- spiratory system. The effect is it intriant Cheracteristica: Min cause smarting and reddening	excrtation, pallor, followed by flushing, weakness, on. Come and possible death. the followed by soap and weter, remove S: flush with plenty of water until imitation subsides, distely. Call a physician, iF breathing is irregular or gen. 0 min. to 500 mg/kg ent in high concentrations, vapors may cause irritation temporary. Imum hazard. If spilled on clothing and allowed to	9. SHIPPING INFORMATION 9.1 Grades of Purity: Industrial pure	= -9696 cal/g = -406.0 X 10° J/kg 12.14 Heat of Decomposition: Not pertinent 12.15 Heat of Solution: Not pertinent 12.16 Heat of Polymerization: Not pertinent 12.25 Heat of Fusion: 30.45 cal/g 12.26 Limiting Value: Data not available 12.27 Reid Vapor Pressure: 3.22 pais		
5.10 Odor Thresho; 5.11 IDLH Velue: 2,	ld: 4.68 ppm					

BNZ

BENZENE

	12.17 JQUID DENSITY		12.18 AT CAPACITY		2.19 L CONDUCTIVITY	LIQUID VI	2.20 SCOSITY
Temperature (degrees F)	Pounds per cubic foot	Temperature (degrees F)	British thermal unit per pound-F	Temperature (degrees F)	British thermal unit-inch per hour- square foot-F	Temperature (degrees F)	Centipoise
55 60 65 70 75 80 85 90 95 100 105 110 120 125 130 135 140 145 150 155 160 165 170	55.330 55.140 54.960 54.770 54.580 54.400 54.210 54.030 53.840 53.660 53.470 53.290 53.100 52.920 52.730 52.540 52.540 52.360 52.170 51.990 51.800 51.620 51.430 51.250 51.060 50.870	45 50 55 60 65 70 75 80 85 90 95	.394 .396 .398 .400 .403 .405 .407 .409 .411 .414 .416 .418	75 80 85 90 95 100 105 110 115 120 125 130 135 140 145 150 155 160	.988 .961 .975 .969 .962 .956 .950 .944 .937 .931 .925 .919 .912 .906 .900 .893 .887 .881 .875 .868	55 60 65 70 75 80 85 90 95 100 105 110 115 120	.724 .693 .665 .638 .612 .588 .566 .544 .524 .505 .487 .470 .453

12.21 SOLUBILITY IN WATER		12.22 SATURATED VAPOR PRESSURE		12.23 SATURATED VAPOR DENSITY		12.24 IDEAL GAS HEAT CAPACITY	
Temperature (degrees F)	Pounds per 100 pounds of water	Temperature (degrees F)	Pounds per square inch	Temperature (degrees F)	Pounds per cubic foot	Temperature (degrees F)	British thermal unit per pound-F
77.02	.180	50 60 70 80 90 100 110 120 130 140 150 160 170 180 190 200 210	.881 1.171 1.535 1.989 2.547 3.227 4.049 5.033 6.201 7.577 9.187 11.060 13.220 15.700 18.520 21.740 25.360	50 60 70 80 90 100 110 120 130 140 150 160 170 180 190 200 210	.01258 .01639 .02109 .02681 .03371 .04196 .05172 .06317 .07652 .09194 .10960 .12980 .15270 .17850 .20750 .23970 .27560	0 25 50 75 100 125 150 175 200 225 250 275 300 325 350 375 400 425 450 475 500 525 550 575 600	.204 .219 .234 .248 .261 .275 .288 .301 .313 .325 .337 .349 .360 .371 .381 .392 .402 .412 .421 .431 .440 .449 .457 .485

SIGNATURE PAGE

HEALTH AND SAFETY PLAN APPROVAL SIGN-OFF

I have read, understood, and agreed with the information set forth in this Health and Safety Plan (and attachments) and discussed in the Personnel Health and Safety Briefing.

Name	Signature	Date
		THE PARTY OF THE P
, , , , , , , , , , , , , , , , , , ,		

REMEDIATION WORK PLAN CLEANING UP REFRACTORY BRICK PILE LOCATED ON CONCRETE PAD

This plan addresses the steps that will be taken to remove, recycle or dispose of non-hazardous materials located on the concrete pad, also referred to as the "debris pile."

In October 1999, the area was characterized by Huff & Huff. Samples of refractory brick were tested using TCLP and determined not to exhibit a hazardous waste characteristic. After further investigation of the materials discarded in the area, Sheffield has identified the following additional materials: trash, mill scale and open-top drums used to transport mill scale and refractory to the area.

The first phase of the Remediation is to hand sort and remove from the debris pile lumber, refractory, concrete, paper, rags, hoses, tires and empty drums. This phase began on March 27, 2000.

The second phase will be to separate all ferrous scrap, which includes empty drums. Each drum will be separately inspected and characterized. Once each drum has been inspected and determined not to contain a hazardous waste, it will be crushed and processed as scrap metal for remelting.

The next step will be to remove a few abandoned appliances from the debris pile and stage them in a separate area. These appliances will be inspected and properly processed before being disposed of off-site in an environmentally safe manner.

Wood, paper, plastic, rubber hoses, tires, rags, refractory brick, concrete blocks and other trash will be separated and sent to Waste Management's Laraway facility in Elwood, Illinois.

The mill scale will be processed through a ½" screener to separate refractory brick and trash. The refractory brick and trash will be disposed of at Waste Management's Laraway facility. The mill scale will be returned to the mill scale pile located on the northwest corner of the facility and sold.

The equipment being used will consist of an excavator, front-end loader, dump truck and Screen-All screener with ½" screens.

Waste Management will transport all non-hazardous waste to their Laraway facility.